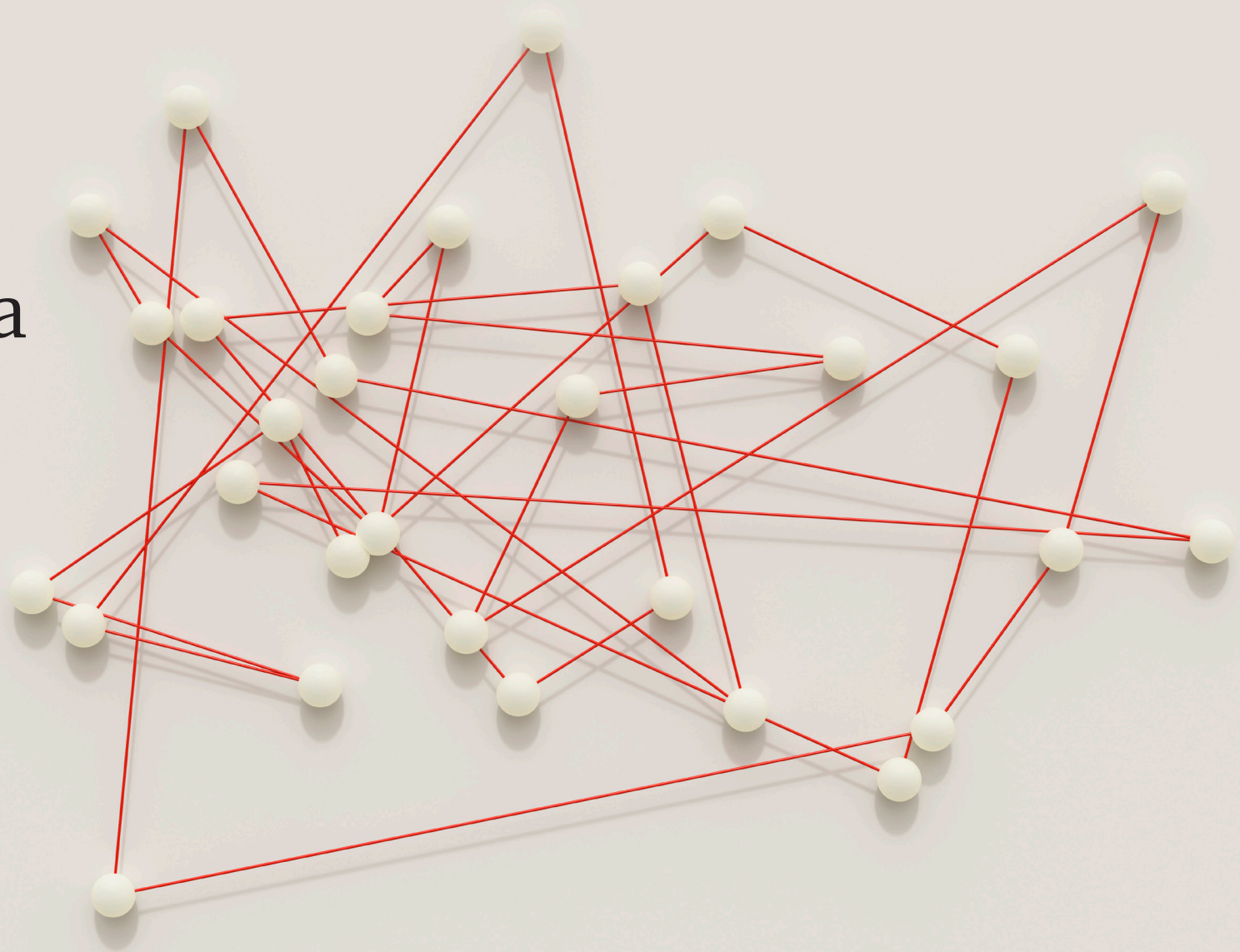*pwc*

Pillar Two Data Input Catalog

www.pwc.com/gx/en/services/tax/pillar-two-readiness

1 Executive summary

In March 2023, PwC published the Data Input Catalog to help prepare Multinational Enterprise Groups (MNEs) for the anticipated implementation of the OECD's Pillar Two. Following this publication, in July 2023, the OECD published additional Administrative Guidance (July Guidance) which covered topics relating to currency conversion rules when calculating Global Anti-Base Erosion (GloBE) income, tax credits taken into account, and the Substance-based Income Exclusion (SBIE). The July Guidance also provided detail as to what constitutes a Qualified Domestic Minimum Top-up Tax (QDMTT) and introduced a QDMTT Safe Harbour. The OECD also published the final version of the GLoBE Information Return (GIR) following an earlier public consultation draft, which provided transitional reporting requirements that allow MNEs to report their GloBE calculations at a jurisdictional level.

This version of the Data Input Catalog has been updated to incorporate the July Guidance. This document provides an overview of the challenges and complexities that MNEs will face upon the implementation of Pillar Two and a detailed guide to the information required for determining and computing amounts under the GloBE Rules.

The evolving international tax landscape

Pillar Two brings unprecedented changes to the global tax system, impacting large multinational companies that operate under the reformed international tax framework. Pillar Two introduces a 15% global minimum Effective Tax Rate (ETR) for MNEs with consolidated revenue over €750m - GloBE Rules. The regime discourages shifting of profits by establishing a global minimum level of taxation in relation to each country where an MNE operates. The Model Rules released in December 2021 (and the accompanying Commentary published in March 2022) define the scope and key mechanics of the GloBE Rules. Since the release of the Model Rules in 2021, there have been two rounds of Administrative Guidance published, the first in February 2023 and the second in July 2023, which helped to explain the Model Rules.

The GloBE Rules, which will impose a Top-up Tax for the difference between the jurisdictional Pillar Two ETR and the 15% minimum rate, consist of (1) the income inclusion rule (IIR), which provides for the jurisdiction of the group's ultimate parent entity, or sometimes an intermediate parent entity, to collect an allocation of the top-up tax according to its ownership interest; and (2) the UTPR (formerly known as the 'Undertaxed Payments Rule'), which is intended to apply as a backstop if low-taxed income is not fully collected under the IIR and which can be applied in the jurisdictions of fellow group members through denials of deductions as well as the imposition of charges. However, where a jurisdiction has implemented a QDMTT, the top-up tax should first be collected in

43%

Modeling and scenario planning has been the top focus for 43% of companies when preparing for Pillar Two.

Source: PwC Tax Readiness Webcast: New Year's Resolution - Prepare for Pillar Two!

that local country before applying the IIR or UTPR. The July Guidance provided a safe harbour for qualifying QDMTTs that sets the IIR or UTPR Top-up Tax to zero for a jurisdiction with a qualifying QDMTT as applied to the relevant MNE.

In December 2022, the European Union formally adopted Pillar Two minimum taxation rules ('EU Directive'). South Korea and Japan approved global minimum tax rules in their respective tax reform proposals. Other countries continue to propose and enact legislation during 2023. Throughout the process, the OECD has released several Pillar Two guidance and consultation documents to shed light on the practical application of the GloBE Rules. These developments will most likely encourage other countries to follow suit. In fact, many countries are expected to bring the GloBE Rules into domestic legislation through 2023 and be effective from 2024, but some may take longer. Many multinationals, however, may already be impacted by the GloBE Rules since the transition rules will capture certain transactions occurring on or after 30 November 2021.

The complexity, novelty, and uncertainty that Pillar Two presents compounds the existing global compliance and regulatory challenges for MNEs. Given the evolving regulatory landscape, global compliance obligations are already overly complicated and demanding for tax departments and administrators. The overhaul of the international tax framework is a massive undertaking for tax departments that are already spread thin and have limited resource capacity. Pillar Two's global adoption, including the anticipated divergence in local rules, poses additional complexities that cannot be underestimated, undoubtedly requiring a global network of international tax experts to help navigate. To prepare for Pillar Two, MNEs will need to focus on data, systems, technology, and processes as the foundation for global and statutory compliance.

Transitional Safe Harbour rules, relying on Country-by-Country Reports (CbCR), aim to limit the administrative and compliance costs of conforming with the new international tax framework and allow some corporations additional time to fully prepare for the compliance and reporting obligations. However, they also raise questions regarding how much simplification or benefit the safe harbour will provide. An MNE Group must comply with the relevant filing requirements (yet to be agreed upon) to access these safe harbour rules, signifying that as a predicate for compliance, MNE Groups will have to invest significant effort to obtain the data regardless of whether the safe harbour can be applied. Further, the Safe Harbours and Penalty Relief document published in December of 2022 required that a Qualified Country-by-Country Report (CbCR) be used, which is a more stringent standard than that required for CbCR reports today.

Divergence in Pillar Two rules

Divergence in rules as countries adopt and implement domestic legislation appears inevitable. The OECD's public consultation document on Tax Certainty for the GloBE Rules acknowledges this, stating:

The common approach under Pillar 2 contemplates that jurisdictions that wish to introduce the GloBE rules will implement and apply their domestic law rules in a consistent and co-ordinated manner. There is still a possibility that differences could arise in the interpretation or application of such rules among jurisdictions that could give rise to divergent outcomes under the GloBE rules.

As countries are reaching agreement, the OECD expects to be releasing further guidance on an ongoing basis, generating future uncertainty about divergence in GloBE Rules and creating significant challenges in how taxpayers will incorporate each implementing jurisdiction's unique adoption of the rules into their Pillar Two calculations. Areas of divergence may include:

- Effective dates of IIRs, UTPRs and QDMTTs
- Mechanics of QDMTTs
- Potential variances in ordering rules
- Computation and interaction with existing CFC tax regimes
- Implementation/application of the Transitional Safe Harbour (and later a more permanent Safe Harbour)
- Other interpretations of IIR and UTPRs

As each implementing country adopts domestic legislation, taxpayers can expect further variances as laws change and evolve. Taxpayers can expect that the list above will continue to expand with Pillar Two global implementation.

Quantitative analysis

To be successful in a global environment with disparate Pillar Two local rules, MNEs will need to employ an agile data model and calculation engine, configured to support the inconsistent and unique adoption of Pillar Two rules around the world and allow for flexibility as those rules continue to evolve. Multiple different variations and interpretations of local rules will require an iterative modeling process for Pillar Two calculations. A calculation engine should also have capacity to perform at volume given the exhaustive data requirements, intra-data relationships, and rules ordering. While a centralized calculation engine will be imperative in a Pillar Two environment, sourcing the underlying data should be an MNE's top priority for Pillar Two readiness.

Data strategy

Identifying the data requirements and developing a comprehensive data strategy should be one of the first steps that taxpayers take in preparation for Pillar Two. Many of the data points may not be readily available in current systems due to novelty and granularity (i.e. level of deconsolidation required at the constituent entity level) required under Pillar Two. The data is likely to exist in the current state across several different source systems (ERP, consolidation system, tax provision & compliance systems, HR systems, sales systems, and other subledger systems) and is owned by different stakeholder groups in an organization (Tax, Controllership, Legal, IT, People, and FP&A). The variety of data sources owned by a diverse group of stakeholders makes the collection and synthesization of the data tremendously challenging. Early cross-functional engagement is critical to ensure that the appropriate data and system owners are aware of what will be required under Pillar Two, why it's important, and how it may impact them going forward.

An MNE will need to establish a cohesive, efficient, and automated process to extract, cleanse, and organize the data. Companies should be thinking about developing a data model that allows them to identify how this information drives Pillar Two calculations and the potential ETR impact. This is arguably one of the most demanding and daunting aspects of ensuring readiness for Pillar Two and not something organizations should wait to explore.
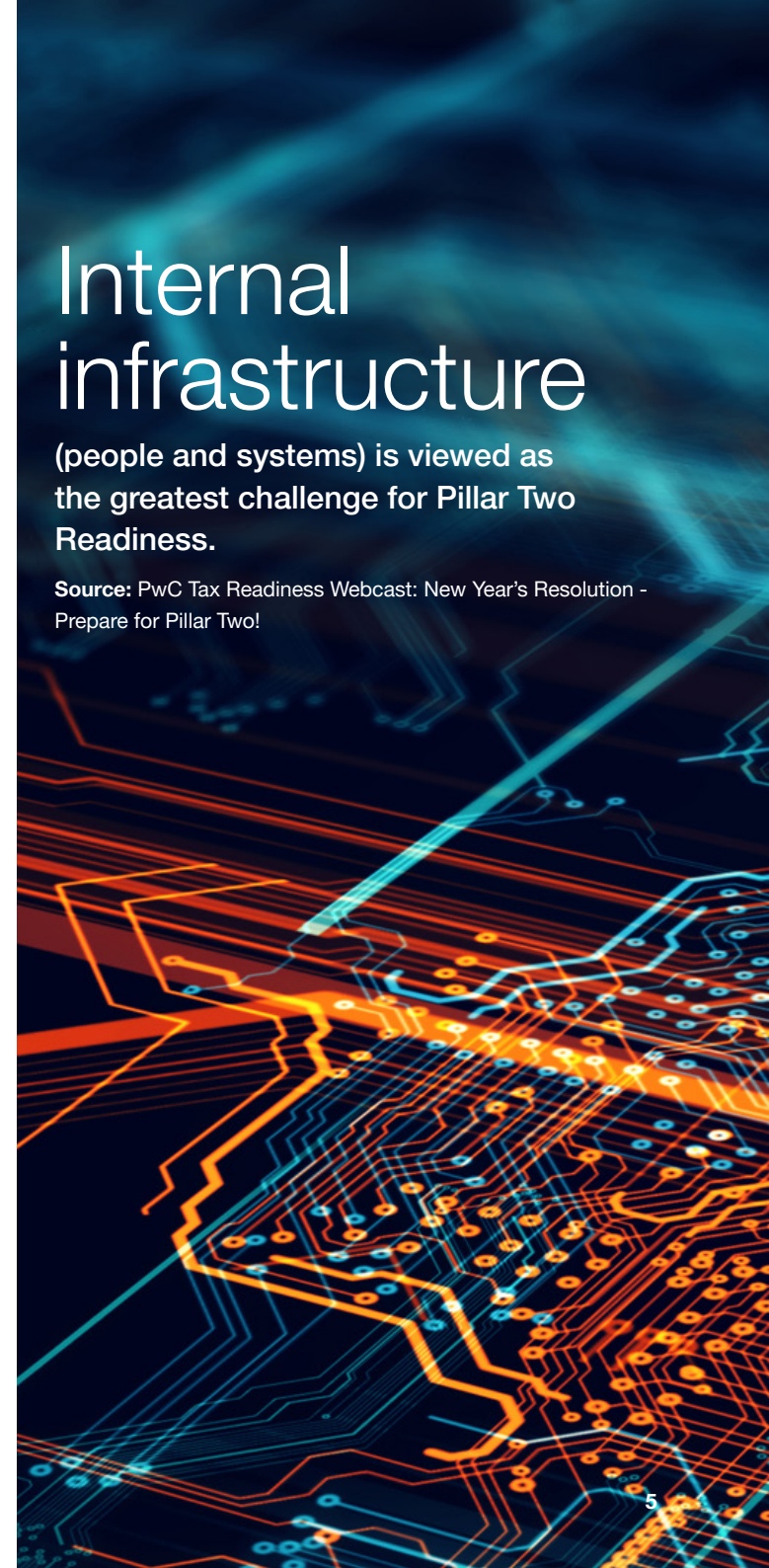
Operational readiness

Inherently tied to a successful data strategy, Pillar Two will likely require a go-forward organizational transformation rooted in systems and processes that can sustain reporting and compliance requirements upon enactment. A current state analysis can help take inventory of the underlying data architecture, system landscape, existing processes, technology sufficiency, and resource capacity, and identify any gaps. The future state for Pillar Two should include a comprehensive data strategy, technology-enabled processes to facilitate the efficient flow of information, enhancements or implementation of new technology, a calculation engine, resource model, connected compliance plan, and effective governance. Once the gaps between the current and future state have been identified, they should be leveraged to construct a roadmap for Pillar Two implementation.

Pillar Two will have a pervasive impact on an organization's financial operating model requiring early stakeholder engagement and substantial budget and resource allocation to address the multitude of challenges. Organizations must ask themselves if their current data model, systems, technology, and processes can support the requirements introduced by this new international tax framework. The complexity of Pillar Two and the level of effort for global compliance cannot be underestimated.

Internal infrastructure

(people and systems) is viewed as the greatest challenge for Pillar Two Readiness.
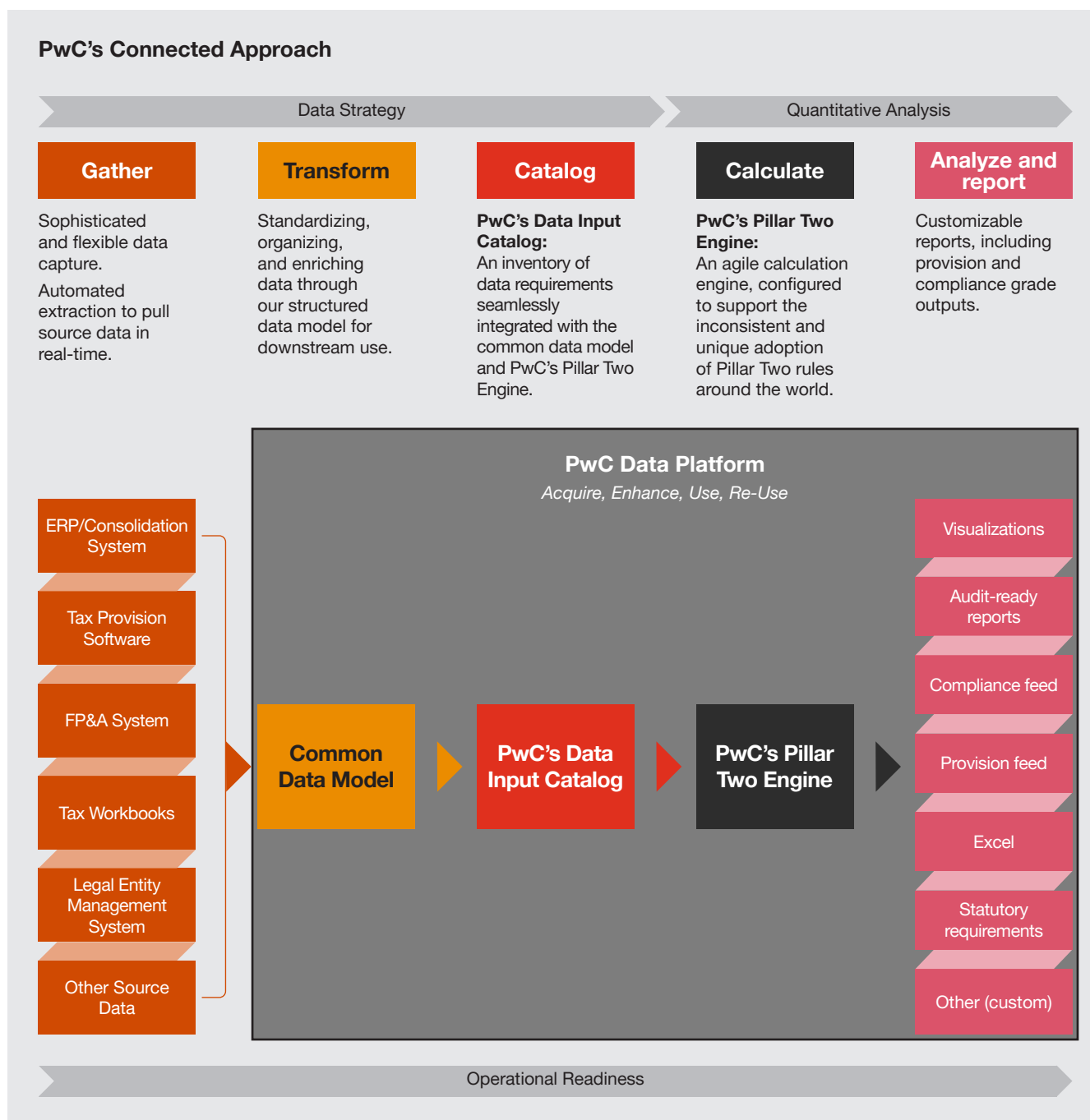
Source: PwC Tax Readiness Webcast: New Year's Resolution - Prepare for Pillar Two!

2 A connected approach

Taxpayers will need to take a holistic approach to determine how data will be sourced, processed, calculated, and reported for Pillar Two compliance. Every company will be unique in the challenges they will face, and thus, there is no one-size-fits-all solution that can address the Pillar Two challenges and complexities. MNEs will need to customize an approach centered around foundational building blocks – resources, data requirements, existing enterprise systems, and other technology (e.g. tax provision software). A connected end-to-end process needs to be designed to support the Pillar Two operating model and compliance process, ideally leveraging as much from the current data and technology ecosystem as possible.

PwC's Data Input Catalog is at the center of PwC's end-to-end process for Pillar Two. The Data Input Catalog defines the data requirements for Pillar Two, giving MNEs a comprehensive understanding of the amount of work that lies ahead of them and can help MNEs anticipate the unique challenges they will face. Acting as the foundation to develop an extensive data strategy, assess operational preparedness, or determine a modeling approach, PwC's Data Input Catalog is the core to Pillar Two readiness.

PwC's Connected Approach

Data Strategy			Quantitative Analysis	
Gather	**Transform**	**Catalog**	**Calculate**	**Analyze and report**
Sophisticated and flexible data capture. Automated extraction to pull source data in real-time.	Standardizing, organizing, and enriching data through our structured data model for downstream use.	**PwC's Data Input Catalog:** An inventory of data requirements seamlessly integrated with the common data model and PwC's Pillar Two Engine.	**PwC's Pillar Two Engine:** An agile calculation engine, configured to support the inconsistent and unique adoption of Pillar Two rules around the world.	Customizable reports, including provision and compliance grade outputs.

PwC Data Platform
Acquire, Enhance, Use, Re-Use

Source data:
- ERP/Consolidation System
- Tax Provision Software
- FP&A System
- Tax Workbooks
- Legal Entity Management System
- Other Source Data

→ **Common Data Model** → **PwC's Data Input Catalog** → **PwC's Pillar Two Engine** →

Outputs:
- Visualizations
- Audit-ready reports
- Compliance feed
- Provision feed
- Excel
- Statutory requirements
- Other (custom)

Operational Readiness

3 Data Input Catalog

In December 2022, the OECD released several Pillar Two guidance and consultation documents that shed light on the practical application of the GloBE Rules, including the GIR. The GIR was finalized in July 2023 following the public consultation in March 2023. Annex A1 of the GIR represents a compilation of Pillar Two data points by constituent entity, exacerbating the intricacy of Pillar Two due to the level of granularity required. The 24 data points included in the GIR to determine GloBE Income (Loss) means that if an MNE has 400 constituent entities, that's almost 10,000 data points that must be sourced and ultimately put on a form. This is assuming that a constituent entity only operates in a single jurisdiction and it is also noteworthy that the obligation to prepare the GIR is separate from any local tax return requirements. Implementing jurisdictions will in many cases also amend the local corporate income tax return to request additional GloBE information pertinent to that jurisdiction, and MNE Groups will need to comply separately with these local requirements.

Understandably, MNEs may be overwhelmed with the amount of work ahead of them. To provide an additional layer to the data requirements introduced by the OECD in GIR Annex A1, PwC has developed a Data Input Catalog for companies to leverage in developing a Pillar Two data strategy.

PwC's Data Input Catalog provides an additional level of detail for specific adjustments to determine the computation of Adjusted Covered Taxes and GloBE Income – how the adjustments are determined and calculated – which is not included in GIR Annex A1. In addition, the qualitative data points included in PwC's Data Input Catalog are intentionally different from GIR Annex A1. There is familiarity with the qualitative data points included in PwC's Data Input Catalog, facilitating an easier and simpler data-gathering process. These qualitative data points are reconciled to GIR Annex A1 as 'Master Data'.

81%

of companies have focused on operational readiness in preparation for Pillar Two.

Source: PwC Tax Readiness Webcast: New Year's Resolution - Prepare for Pillar Two!

PwC's Pillar Two Engine, a centralized calculation engine with graphical databases, is configured to support the inconsistent and unique adoption of Pillar Two rules in every adopting country. With many output and reporting capabilities, PwC's Pillar Two Engine is designed to support the many regulatory and compliance requirements. PwC's Data Input Catalog only includes the inputs required for Pillar Two, which can then be efficiently sourced to PwC's Pillar Two Engine. The Pillar Two calculations for all jurisdictions and constituent entities are then performed in the Pillar Two Engine. On the contrary, the GIR Annex A1 includes all data points, calculated fields, aggregations, etc. making it difficult for clients to distinguish between source and calculated data.

4 How PwC can help

PwC professionals can help provide additional explanations, user stories and practical application of each data requirement that assist clients in navigating the complexity and relevancy of the rules from PwC's Data Input Catalog. Contact a PwC professional for a deeper understanding of the Pillar Two data requirements and how PwC's Data Input Catalog can help determine how to access the financial data needed to comply, identify gaps in the data needed for reporting, and model Pillar Two impact using our centralized calculation engine. More broadly, PwC professionals can help assess and model the likely financial and operational consequences of Pillar Two, including re-evaluating operations given the anticipated law changes in many countries.

Learn more:

Tax Policy and Administration

International Tax Services

Tax Reporting and Strategy

Assess

PwC helps assess and model the likely financial and operational consequences of Pillar Two, including:

- Evaluating data accessibility and quality, enterprise and tax system configuration gaps and opportunities for remediation.

- Understanding how the various data requirements map into the calculation itself.

- Standing up new processes that will be required under Pillar Two.

- Analyzing the potential benefit of making certain elections under Pillar Two.

- Modeling to understand both Pillar Two financial impact and process impact on key jurisdictions.

- Assessing whether operational or structural changes may be beneficial.

- Aligning stakeholders and determining operating model impacts.

- Providing tax policy background to contextualize the data requirements.

- Advising on the potential tax policy direction of travel for future rules.

- Suggesting input into the process to improve rules.

Report

PwC can enhance reporting and data analytics capabilities, including:

- Detailed modeling to provide the data for financial disclosures.

- Validating deferred balances ahead of the first Pillar Two reporting period.

- Updating ERP/CPM processes and cloud data solutions.

- Reviewing the existing tax reporting process and use of technology to automate / streamline.

- Consulting on tax accounting treatment, reviewing disclosures.

Comply

PwC can help meet ongoing reporting and compliance obligations, including:

- Supporting the development and configuration of modeling and compliance solutions using your existing systems or your internally developed solution.

- Utilizing PwC's Pillar Two Engine to help reduce the time and cost associated with your future reporting and compliance obligations.

- Documenting Pillar Two related processes and controls to align with tax governance frameworks.

- Determining and consulting on how Pillar Two fits into the wider compliance and reporting process to increase efficiencies and insights, leveraging connected data.

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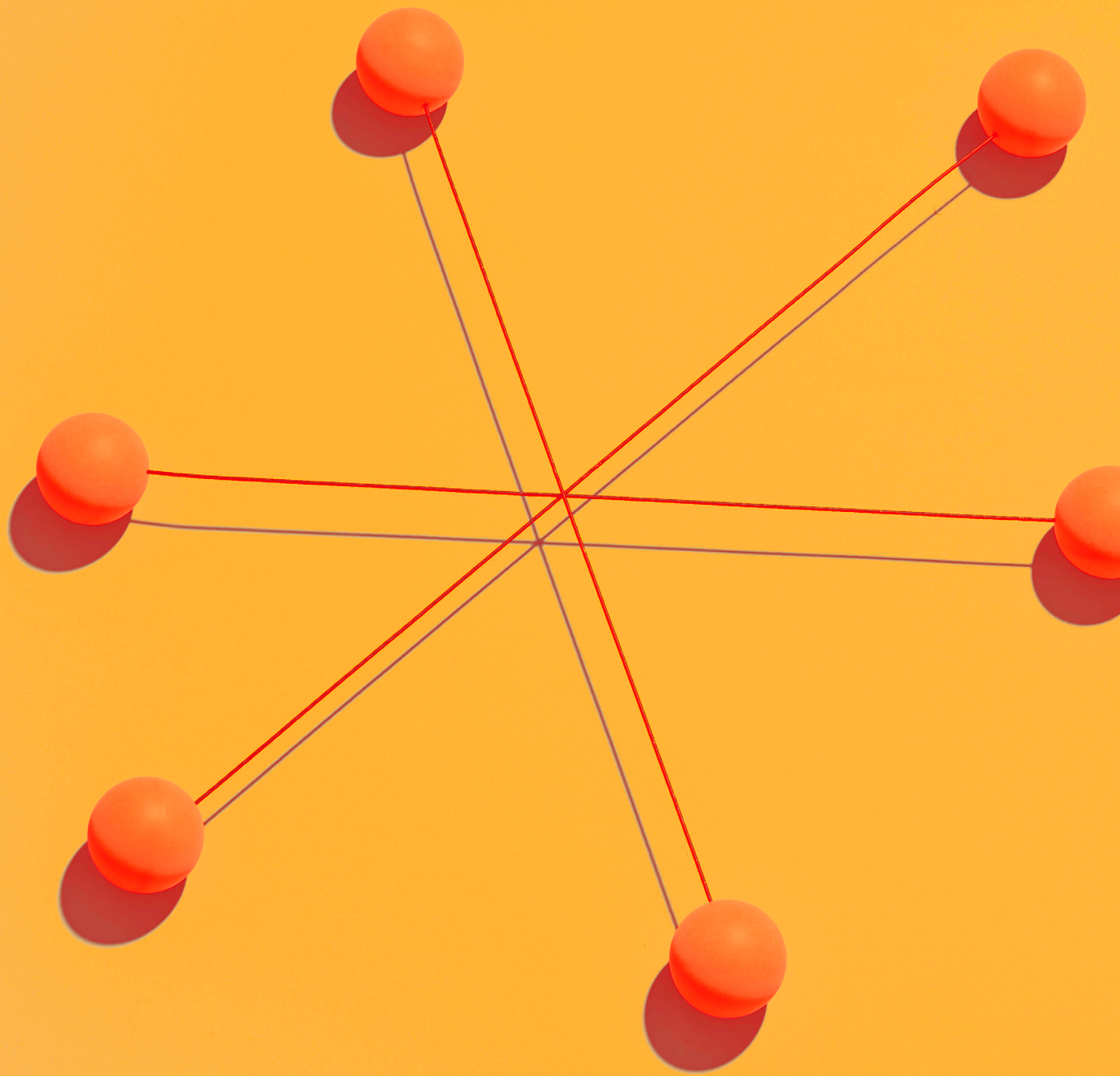**Jason Martin**
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6 Data Input Catalog

Appendix A
Constituent Entities

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
1.01	**Group Information**					
1.02	List of Constituent Entities (including Permanent Establishments and any entities that may be excluded for GloBE purposes)	Out of System	Legal / Tax	1.3.1(a)	3.2	Master Data
1.03	Direct ownership percentage of each CE held within the group by other Constituent Entities (UPE/POPE/IPE)	Out of System	Legal / Tax			
1.04	Direct ownership percentage of each CE held outside the group (3rd party or non-Constituent Entity)	Out of System	Legal / Tax			
1.05	Controlling interests (in %) of the Ultimate Parent Entity in each Constituent Entity (calculated by Pillar Two Engine based on direct ownership percentages above)	Calculated	Legal / Tax	8.1.4(b)	42.5.b	1.3.2.1.10
1.06	Consolidated Financial Statements of the UPE (type)	Out of System	Finance	3.1.2		1.2.2.1
1.07	Financial Accounting standard(s) used for the CFS of the UPE	Out of System	Finance	3.1.2		1.2.2.2, 3.3.4.1
1.08	Group reporting currency (consolidated financial statements)	Out of System	Finance	Jul AG 1		
1.09	Designated local entity for each jurisdiction	Out of System	Legal / Tax		42.1.a	Master Data
1.10	List transactions after 30 November 2021, but before commencement of first Transition Year	Out of System	Finance / Tax	9.1.3		
1.11	List transactions in the current year	Out of System	Finance / Tax			1.3.3.a
1.12	List of fiscal unity / tax consolidation groups within MNE group	Out of System	Legal / Tax	3.2.8		
1.13	List of CFC regimes within MNE group (including blended CFC regimes)	Out of System	Legal / Tax			
1.14	List of Main Entities that own a PE/branch/disregarded entity/flow-through	Out of System	Legal / Tax	3.4, 3.5		
1.15	Average December FX rate December previous year as quoted by ECB	Out of System	Finance / Tax			
1.16	Nominal statutory tax rate for UPE jurisdiction	Out of System	Tax			2.2.1.3.b.1
1.17	**Entity Information**					
1.18	Tax identification number for each Constituent Entity	Data Point	Legal / Tax	8.1.4(a)	42.5.a	Master Data
1.19	Legal form	Out of System	Legal / Tax			Master Data
1.20	Third currency of any financial/operation transactions (if applicable)	Out of System	Legal / Tax			
1.21	Location for each Constituent Entity	Data Point	Legal / Tax	10.3	42.5.a	Master Data
1.22	Accounting functional currency	Data Point	Legal / Tax	3.2.1(f)		1.2.2.2
1.23	Tax functional currency	Data Point	Legal / Tax	3.2.1(f)		1.2.2.3

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
1.24	"Status for GloBE purposes (Tax qualification for each Constituent Entity): - Incorporated entity - Permanent establishment - Hybrid - Reverse hybrid - Tax transparent entity - Qualified ownership interest (tax transparent entity) - Investment entity - Insurance investment entity - Governmental entity - International organisation - Non-profit organisation - Pension fund - Joint Venture	Out of System	Legal / Tax	10.1, 10.2, Feb AG 2.9 par 57.8		1.3.1.6
1.25	If the entity is transferred during the current year, number of days/months the financials are included (and where) within the structure	Out of System	Legal / Tax			
1.26	Current tax rate	Out of System			2.2.1.3.b.1	2.2.1.3.b.1
1.27	Deferred tax rate	Out of System				
1.28	GloBE Revenue (after GloBE adjustments and after consolidation adjustments attributable to intra-group transactions)	Data Point	5.5.1(a)		2.2.2.1.2	2.2.2.1.2
1.29	Acceptable or Authorised Financial Accounting Standard (if different than UPE)	Data Point	3.1.3		3.2.4.6.2	3.2.4.6.2
1.3	Transition Year		9.1, Jul AG 4 par 45-54			

Appendix B
Computation of GloBE
Income or Loss

Ref #	Description	Category	Typical Data Owner	References OECD MR	EU DIR	GIR
2.01	**Financial Accounting Net Income or Loss (before any consolidation adjustments for intra-group transactions). Profit After Tax as recorded in the legal entity accounts under group accounting standard.**	**Data Point**	Finance / Controllership	3.4.5		
2.02	Loss incurred at PE in the current year that is deductible at Main Entity	Data Point	Finance / Controllership	3.4.5		
2.03	Loss incurred at PE in a prior year that was deducted at Main Entity	Data Point	Finance / Controllership	3.4, 3.5		3.2.4.1.b.7
2.04	Items booked in this entity (including in case the entity is the UPE) that are related to and can reliably be traced to other CEs.	Data Point	Finance / Controllership	3.4, 3.5		3.2.4.1.b.6
2.05	Items booked in a different entity (Main Entity, group/consolidated financial accounts) related to this entity	Data Point	Finance / Controllership	3.1.2		
2.06	Reverse all profit and loss adjustments related to intra-group transactions (consolidation/elimination adjustments) unless consolidation election is made	Data Point	Finance / Controllership			
2.07	Reverse all items related to purchase accounting (including depreciation and amortization) from the CE	Calculation	Finance / Controllership	3.3	16	3.2.4.4.a.5
2.08	**International Shipping Income Exclusion**	**Data Point**	Finance / Controllership	3.3.2		
2.09	International Shipping Income (ISI)	Data Point	Finance / Controllership	3.3.3		
2.10	Qualified Ancillary International Shipping Income (QAISI)	Data Point	Finance / Controllership	3.3.3	16	
2.11	Costs directly allocable to ISI	Data Point	Finance / Controllership	3.3.5		
2.12	Costs directly allocable to QAISI	Data Point	Finance / Controllership	3.3.5		
2.13	Costs not directly allocable - apportioned on revenue	Data Point	Finance / Controllership	3.3.5		
2.14	Location of strategic and commercial management of ships with ISI & QAISI	Data Point	Finance / Controllership	3.3.6		
2.15	**(a) Net Taxes Expense**	**Calculation**	Tax			3.2.4.2.a.3.a
2.16	Covered taxes accrued as an expense (above the tax line);	Calculation	Tax			3.4.2.a.2.b
2.17	Current taxes included in income tax expense	Calculation	Tax			3.2.4.2.a.3.r
2.18	Deferred taxes included in income tax expense	Calculation	Tax			3.2.4.2.a.3.r
2.19	Interest related to Covered Taxes	Calculation	Tax			
2.20	Penalties related to Covered Taxes	Calculation	Tax			
2.21	(Non-qualified) domestic top-up taxes accrued as an expense;	Calculation	Tax			
2.22	Taxes arising pursuant to the GloBE rules (QDMTT/IIR/UTPR) that are included as an expense/income tax	Calculation	Tax			

Ref #	Description	Category	Typical Data Owner	OECD MR	EU DIR	GIR
2.23	Disqualified refundable imputation taxes accrued as an expense	Calculation	Tax			
2.24	**(b) Excluded Dividends**	**Calculation**	Finance / Tax	3.2.1(b)	15.1.b	3.2.4.1.a.3.b
2.25	Non-Portfolio Shareholding	Data Point	Finance / Tax			
2.26	**Short-term Portfolio Shareholding**	**Data Point**	Finance / Tax			
2.27	Non-short-term Portfolio Shareholding	Data Point	Finance / Tax			
2.28	(Election) Include all Portfolio Shareholding in GloBE Income			Feb AG 3.5		
2.29	(Election) Dividends received from Investment Entity subject to election under Article 7.6	Data Point	Finance / Tax	7.6, 10.1		3.2.4.5.2
2.30	**(c) Excluded Equity Gain or Loss**	**Calculation**	Finance / Controllership	3.2.1(c)	15.1.c	3.2.4.1.a.3.c
2.31	Gains and losses from changes in fair value of an Ownership Interest; except for a disposition of a Portfolio Shareholding	Data Point	Finance / Controllership			
2.32	Profit or loss in respect of an Ownership Interest included under the equity method of accounting; except for a disposition of a Portfolio Shareholding	Data Point	Finance / Controllership			
2.33	Gains and losses from disposition of an Ownership Interest, except for a disposition of a Portfolio Shareholding	Data Point	Finance / Controllership			3.2.3.1.b.1
2.34	(Election) Equity Investment Inclusion Election	Calculation	Finance / Controllership	Feb AG 2.9.2		
2.35	**(d) Included Revaluation Method Gain or Loss (changes in value of carrying value of property, plant and equipment included in OCI)**	**Calculation**	Finance / Controllership	3.2.1(d)	15.1.d	3.2.4.1.a.3.d
2.36	(Election) Use of the realisation method in lieu of fair value or impairment accounting	Calculation	Finance / Tax	3.2.5		3.2.4.1.a.3.o
2.37	Fair value revaluation gains or loss recorded in P&L - reverse if realisation method is elected	Data Point	Finance / Controllership			
2.38	Eliminate difference in depreciation from P&L in case the realisation method is elected	Data Point	Finance / Controllership			
2.39	Fair value revaluation gains or losses recorded in OCI - add to GloBE Income unless realisation method is elected	Data Point	Finance / Controllership	3.2.1		
2.40	Adjust the depreciation on revalued assets unless the realisation method is elected	Data Point	Finance / Controllership	3.2.1		
2.41	**Include the realized gain or loss upon disposition of any asset subject to the realisation method election**	**Data Point**	Finance / Controllership	3.2.5		
2.42	If election is revoked, GloBE Income or Loss is adjusted by the difference between the fair value and the carrying value pursuant to the election	Data Point	Finance / Controllership	3.2.5(c)		
2.43	**(e) Gain or loss from disposition of assets and liabilities excluded under Article 6.3**	Calculation	Finance / Controllership	3.2.1(e)		3.2.4.1.a.3.e

Ref #	Description	Category	Typical Data Owner	OECD MR	EU DIR	GIR
				References		
2.44	**If acquisition/disposition is part of a GloBE Reorganisation, disposing CE excludes any gain/loss from GloBE Income and aquiring CE determines its GloBE Income and basis using disposing CEs carrying value**	**Data Point**	Finance / Controllership	6.3.2, 6.3.3		
2.45	If acquisition/disposition is not part of a GloBE Reorganisation, disposing CE includes any gain/loss in GloBE Income and aquiring CE determines its GloBE Income and basis using aquiring CE's carrying value	Data Point	Finance / Controllership	6.3.1		
2.46	(Election) Fair value recognition	Calculation	Finance / Controllership	6.3.4		
2.47	**(f) Asymmetric Foreign Currency Gains or Losses**	**Calculation**	Finance / Tax	3.2.1(f)	15.1.e	3.2.4.1.a.3.f
2.48	FX included in taxable income and caused by difference between tax and accounting functional currency;	Data Point	Finance / Tax			
2.49	FX included in accounting income and caused by the difference between tax and accounting functional currency;	Data Point	Finance / Tax			
2.50	FX fluctuation between a (third) foreign currency and the accounting functional currency;	Data Point	Finance / Tax			
2.51	FX fluctuation between a (third) foreign currency and the tax functional currency;	Data Point	Finance / Tax			
2.52	FX result on PE recorded in the main entity because the accounting currency of the PE differs from the tax functional currency of the main entity and there is a taxable FX result on the PE	Data Point	Finance / Tax			
2.53	**(g) Policy Disallowed Expenses**	**Calculation**	Finance / Controllership	3.2.1(g)	15.1.f	3.2.4.1.a.3.g
2.54	Expenses accrued by the Constituent Entity for illegal payments, including bribes and kickbacks	Data Point	Finance / Controllership			
2.55	Expenses accrued by the Constituent Entity for fines and penalties that equal or exceed EUR 50,000 (or an equivalent amount in the functional currency in which the Constituent Entity's Financial Accounting Net Income or Loss was calculated)	Data Point	Finance / Controllership			
2.56	**(h) Prior Period Errors and Changes in Accounting Principles**	Calculation	Finance / Tax	3.2.1(h)	15.1.g	3.2.4.1.a.3.h, 3.2.4.1.a.3.i
2.57	An error or change that does not lead to a corresponding decrease of Covered Taxes in a previous Fiscal Year of 1M EUR or more (per jurisdiction)	Data Point	Finance / Tax			
2.58	An error or change that does lead to a corresponding decrease of Covered Taxes in a previous Fiscal Year of 1M EUR or more (per jurisdiction)	Data Point	Finance / Tax			
2.59	**(i) Accrued Pension Expense**	**Calculation**	Finance / Controllership	3.2.1(i)	15.1.h	3.2.4.1.a.3.j
2.60	Amount of pension liability expense included in the Financial Accounting Net Income or Loss	Data Point	Finance / Controllership			
2.61	Amount contributed to a Pension Fund for the Fiscal Year	Data Point	Finance / Controllership			
2.62	Income reallocated in the context of Pillar One	Data Point	Tax	3.2.2	15.3	
2.63	Arm's length principle adjustments	Calculation	Finance / Tax	3.2.3		3.2.4.1.a.3.m
2.64	Transactions between Constituent Entities located in different jurisdictions	Data Point	Finance / Tax			

Ref #	Description	Category	Typical Data Owner	OECD MR	EU DIR	GIR
2.65	Transactions between Constituent Entities located in the same jurisdiction resulting in a loss to the transferor.	Data Point	Finance / Tax			
2.66	Transactions between Constituent Entities and Minority-owned Constituent Entities'/MOCE Group entities	Data Point	Finance / Tax			
2.67	Transactions between Constituent Entities and JVs/JV Group entities	Data Point	Finance / Tax			
2.68	**Qualified Refundable Tax Credits & non-qualifying tax credits**	**Calculation**	Tax	3.2.4	15.5	3.2.4.1.a.3.n
2.69	Qualified Refundable Tax Credit is included in Current Tax	Data Point	Tax			
2.70	Non-Qualified Refundable Tax Credit or non-refundable credit is included in PBT	Data Point	Tax			
2.71	Marketable Transferable Tax Credits	Data Point	Tax	Jul AG 2		
2.72	**Low-Tax Entity intragroup financing arrangement**	**Calculation**	Tax	3.2.7	15.8	3.2.4.1.a.3.q
2.73	**(Election) Stock based compensation**	**Calculation**	Finance / Tax	3.2.2	15.3	3.2.4.1.a.3.l
2.74	Stock based compensation expense included in Financial Accounting Net Income or Loss	Data Point	Finance / Tax	3.2.2	15.3	
2.75	Stock based compensation deducted for tax purposes	Data Point	Finance / Tax			
2.76	If election is made, eliminate the receipt of the cross-charge from CE that incurred the costs at grant and charges out the costs at vest	Data Point	Finance / Tax			
2.77	If election is not made, eliminate the payment of the cross-charge to the entity that has incurred the cost at grant	Data Point	Finance / Tax			
2.78	Previously deducted stock-based compensation expense of options that have been expired without exercise.	Data Point	Finance / Tax			
2.79	(Election) Aggregate Asset Gain	Calculation	Finance / Tax	3.2.6	15.7	3.2.4.1.a.3.p
2.80	**(Election) Tax consolidation group adjustments**	**Calculation**	Finance / Tax	3.2.8	15.9	3.2.4.1.a.3.r
2.81	(Election) Debt Release Exclusion	Calculation	Finance / Controllership	Feb AG 2.4		3.2.4.1.a.3.k
2.82	**Insurance company specific deductions/additions**	**Calculation**	Finance / Tax		15.1	3.2.1.1.2.s, 3.2.4.1.a.3.s
2.83	Amounts charged to policyholders for taxes paid by the insurance company in respect of returns to the policyholders	Data Point	Finance / Tax	3.2.9		
2.84	Any returns to policyholders not included in Financial Accounting Net Income or Loss to the extent the corresponding increase or decrease in liability to the policyholders is reflected in its Financial Accounting Net Income or Loss	Data Point	Finance / Tax	3.2.9		
2.85	Movement in insurance company's reserves related to Excluded Dividends	Data Point	Finance / Tax	Feb AG 3.4.1		
2.86	Movement in insurance company's reserves related to Excluded Equity Gain or Loss	Data Point	Finance / Tax	Feb AG 3.4.2		
2.87	**Equity increase/decrease attributable to distributions paid or payable in respect of Additional Tier One Capital and Restricted Tier One Capital**	Calculation	Finance / Tax	3.2.10	15.11	3.2.1.1.2.t, 3.2.4.1.a.3.t
2.88	Issuer/Subscriber of Additional Tier One Capital/Restricted Tier One Capital distributions paid or payable	N/A	Finance / Tax			

Ref #	Description	Category	Typical Data Owner	OECD MR	EU DIR	GIR
2.89	**(i) Amounts recognized as an increase to the equity**	**Data Point**	Finance / Tax			
2.90	(ii) Amounts recognized as an expense	Data Point	Finance / Tax	7.1.1		3.4.1.a.2.u
2.91	PLACEHOLDER - Conversion or write-off in the books of the Issuer/Subscriber	Data Point	Finance / Tax			
2.92	**Adjustments for Chapter 7 - Tax neutrality and distribution regimes**	**Calculation**	Tax	3.2.11 - ref to Chapter 7		3.2.4.1.d
2.93	Flow-through Entity reduction (UPE)	Out of System	Tax	7.1.1		3.2.4.1.a.3.v
2.94	Deductible Dividend Regime reduction (UPE)	Out of System	Tax	7.2.1		3.2.4.1.a.3.w
2.95	**(Election) Eligible Distribution Tax Systems**	**Out of System**	Tax	7.3		3.2.3.2.1
2.96	(Election) Investment Entity Tax Transparency	Out of System	Tax	7.5		3.2.4.3.3.f
2.97	(Election) Taxable Distribution Method Election	Out of System	Tax	7.6		3.2.4.3.3.g
2.98	**Share and asset transactions**	**Calculation**	Finance / Tax	6.2-6.3, 9.1		
2.99	Business transfer by 3rd Party in an asset deal - no adjustment	Data Point	Finance / Tax			
2.1	Business transfer by 3rd party in a stock deal - remove basis related to purchase price accounting	Data Point	Finance / Tax			
2.101	Business transfer by 3rd party in a stock deal treated as an asset sale under Article 6.2.2 (before GloBE rules are in effect) - remove basis related to purchase price accounting	Data Point	Finance / Tax			
2.102	Business transfer by 3rd party in a stock deal treated as an asset sale under Article 6.2.2 (after GloBE rules are in effect) - no adjustment	Data Point	Finance / Tax			
2.103	Intercompany asset sale/transfer: common control (before transition period) - no adjustment	Data Point	Finance / Controllership			
2.104	Intercompany asset sale/transfer: no common control (before transition period) - no adjustment	Data Point	Finance / Tax			
2.105	Intercompany asset sale/transfer (during transition period) - adjust basis to the seller's carrying value	Data Point	Finance / Tax			
2.106	Cross-border Intercompany asset sale/transfer: common control (after GloBE rules are in effect) - no adjustment	Data Point	Finance / Tax			
2.107	Cross-border Intercompany asset sale/transfer: no common control (after GloBE rules are in effect) - no adjustment	Data Point	Finance / Tax	2.104	2.104	2.104

Appendix C
Computation of Adjusted
Covered Taxes

Ref #	Description	Category	Typical Data Owner	OECD MR	EU DIR	GIR
3.01	**"Current tax expense accrued in Financial Accounting Net Income or Loss with respect to Covered Taxes for the Fiscal Year** **SUBJECT TO THE ALLOCATION RULES APPLYING TO QUALIFYING INCOME OF PEs, HYBRIDS, REVERSE HYBRIDS, TRANSPARENT ENTITIES AND WITH RESPECT TO SHIPPING INCOME."**	Calculation	Tax	4.1, 4.3	19	3.2.4.2.b.2
3.02	Allocation of Taxes Between Constituent Entities: CFC Regimes					3.2.4.2.b
3.03	Tax imposed under a CFC regime on the CE - exclude from paying entity	Calculation	Tax	4.3.2(c)		
3.04	Passive Income that is includible under the CFC Tax Regime in the financial accounts of a direct or indirect Constituent Entity-owner	Data Point	Tax	4.3.3		
3.05	Covered Taxes included under the CFC Tax Regime of a Constituent Entity-owner in respect of Passive Income	Data Point	Tax	4.3.3		
3.06	GILTI Inclusion (including Sec. 78 Gross-up)	Calculation	Tax			
3.07	Sec. 250 Deduction related to GILTI Inclusion	Calculation	Tax			
3.08	FTCs utilized in GILTI basket	Calculation	Tax			
3.09	Tested Income of each Consituent Entity included in GILTI calculation	Calculation	Tax			
3.10	**Allocation of Taxes Between Constituent Entities: PEs & Flow-throughs**					3.2.4.2.b
3.11	Passive Income that is includible under the fiscal transparency rule in the financial accounts of a direct or indirect Constituent Entity-owner of a Hybrid entity	Data Point	Tax	4.3.3		
3.12	Covered Taxes allocated to a Hybrid Entity by a Constituent Entity-owner in respect of Passive Income	Data Point	Tax	4.3.2(d)		
3.13	Covered Taxes included in the financial accounts of a direct or indirect Constituent Entity-owner under a Anti-Hybrid-Mismatch Tax Regime	Data Point	Tax			
3.14	Covered taxes arising in the location of the PE associated with GloBE income pursuant to Article 3.4.5	Data Point	Tax	4.3.4		
3.15	**Allocation of Taxes Between Constituent Entities: Distributions**					3.2.4.2.b
3.16	Withholding Tax on distributed profits (transfer from recipient to payor)	Data Point	Tax	4.2.1(a)		
3.17	Tax paid by recipient on income that is exempt under GloBE rules	Data Point	Tax	4.2.1(a)		
3.18	Taxes on distributed profits, deemed profit distributions, and non-business expenses imposed under an Eligible Distribution Tax System	Calculation	Tax	4.2.1(b)		
3.19	Tax imposed in lieu of corporate income tax, including Withholding Tax on interest and royalties (to the extent not included above)	Data Point	Tax	4.2.1(c)		
3.20	Disqualified Refundable imputation tax	Data Point	Tax	4.2.2(d)		
3.21	**Any increase or decrease in Covered Taxes recorded in equity or Other Comprehensive Income relating to amounts included in the computation of GloBE Income or Loss that will be subject to tax under local tax rules (other than tax effect of the Revaluation Method for PPE)**	Calculation	Tax	4.1.1	20	3.2.4.2.a.3.r

Ref #	Description	Category	Typical Data Owner	References OECD MR	References EU DIR	References GIR
3.22	**Reverse tax effect of the use of the Revaluation Method in case realisation method is elected.**	Data Point	Tax			
3.23	**In case realisation method is elected and tax is booked in the P&L - reverse any taxes booked in P&L because of realisation**	Data Point	Tax			
3.24	In case realisation method is elected include taxes paid upon realisation of the gain	Data Point	Tax			
3.25	In case realisation method is elected, tax is booked in the P&L, and depreciation is lowered because of (de)valuation-reverse any taxes booked in P&L because of lower depreciation	Data Point	Tax			
3.26	Qualified Flow-through Tax Benefits derived through a Qualified Ownership Interest in a Tax Transparent Entity	Data Point	Tax	Feb AG 2.9		3.2.4.2.a.3.e
3.27	**(Election) Foreign Exchange Hedge on Excluded Equity Gain or Loss**	Data Point	Finance / Tax			
3.28	**Additions to covered taxes of a Constituent Entity**	Calculation	Tax	4.1.2		
3.29	**Covered tax accrued as expense**	Data Point	Tax	4.1.2(a)		3.2.4.2.a.3.a
3.3	(Election) Amount of qualifying loss DTA used	Data Point	Tax	4.1.2(b)		3.2.4.2.a.3.b
3.31	Amount of UTP previously excluded and paid in the current year (excluding interest & penalties)	Calculation	Tax	4.1.2(c)		3.2.4.2.a.3.c
3.32	Amount of interest and penalties included in the UTP payment above (eliminate)	Calculation	Tax			3.2.4.2.a.3.c
3.33	Amount of Qualified Refundable Tax Credit accrued as a reduction of tax expense	Calculation	Tax	4.1.2(d)	20.2	3.2.4.2.a.3.d
3.34	Amount of Marketable Transferable Tax Credit accrued as a reduction of tax expense	Calculation	Tax	4.1.2(d)	20.2	3.2.4.2.a.3.d
3.35	Taxes or surcharges on specific activities such as banking or exploration of oil and gas.	Data Point	Tax	4.2.1		
3.36	**Reductions to covered taxes of a Constituent Entity (4.1.3)**	**Calculation**	Tax	4.1.3	20.3	
3.37	Tax related to excluded income or loss under Chapter 3 - other than taxes on distribution paid by paying or receiving entity.	Data Point	Tax	4.1.3(a)		3.2.4.2.a.3.f
3.38	Non-Qualified Refundable Tax Credit not treated as a reduction to current tax expense	Data Point	Tax	4.1.3(b)		3.2.4.2.a.3.g
3.39	Any portion of Marketable Transferable Tax Credit treated as income that does not meet the legal transferability and marketability standards	Calculation	Tax	4.1.2(d)	20.2	3.2.4.2.a.3.d
3.4	Tax credit or refund, except for any QRTC or MTTC, that wasn't treated as a reduction of tax expense	Data Point	Tax	4.1.3(c)		3.2.4.2.a.3.h
3.41	Amount of tax expense related to Uncertain Tax Positions	Calculation	Tax	4.1.3(d)		3.2.4.2.a.3.i
3.42	Amount of current ax expense accrued (not expected) to be paid within 3 years	Data Point	Tax	4.1.3(e)		3.2.4.2.a.3.j
3.43	All current tax accrual amounts included in Covered Taxes in year T-3 that have not been paid by the end of the current Fiscal Year	Data Point	Tax	4.1.3(e)		
3.44	All current tax accrual amounts included in Covered Taxes that have not been paid within three years in excess of 1M EUR per year per jurisdiction	Calculation	Tax	4.6.1		

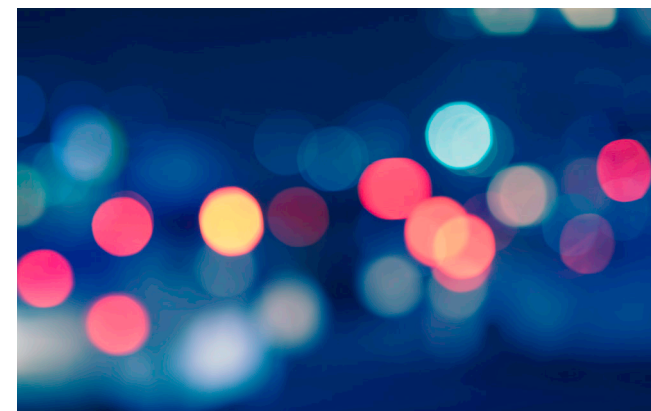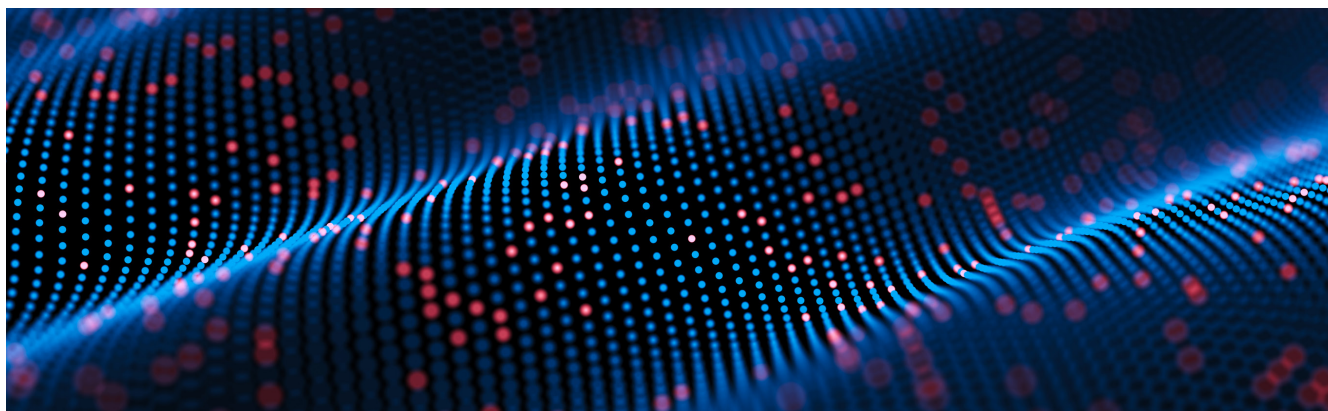| Ref #	Description	Category	Typical Data Owner	OECD MR	EU DIR	GIR
				References		
3.45	Current tax expense related to qualifying debt release (if elected)	Data Point		Feb AG 2.4		
3.46	Covered taxes related to Aggregate Asset Gain (if elected in current year)	Data Point		3.2.6(a)		3.2.4.2.a.3.l
3.47	Interest related to Covered Taxes	Data Point	Tax			
3.48	Penalties related to taxes	Data Point	Tax			
3.49	Taxes paid by an insurance company with respect to returns to policyholders	Data Point	Tax	4.2.2(e)		3.2.4.1.a.3.s
3.5	IIR Top-up Tax included in income tax expense of parent CE	Data Point	Tax	4.2.2(a)		3.4.1.3.1.c
3.51	Qualified Domestic Top-up tax included in income tax expense	Data Point	Tax	4.2.2(b)		3.3.1.e
3.52	UTPR taxes included in income tax expense	Data Point	Tax	4.2.2(c)		3.3.4.2
3.53	**Post filing adjustments (i.e. adjusted after the return with respect to that year was filed.)**	**Calculation**	Tax	4.6	24	3.2.4.2.a.3.k
3.54	Post filing adjustments - included increase in current FY; reverse and analyze decrease based on rules below	Calculation	Tax	4.6.1		
3.55	(Election) Post filing adjustments - decrease < 1M EUR per jurisdiction per year	Calculation	Tax	4.6.1		
3.56	Post filing adjustments - decrease > 1M EUR per jurisdiction per year - deduct from CT in the year the tax liability is re-calculated	Data Point	Tax	4.6.1		
3.57	**Deferred Tax Alternative A: Total Deferred Tax Adjustment Amount**	**Calculation**	Finance / Tax / FP&A	4.4	21	3.2.4.2.a.3.q
3.58	Deferred tax expense accrued in the CE's financial accounts	Calculation	Finance / Tax / FP&A	4.4.1	21.2	3.2.4.2.c.2
3.59	Deferred tax booked in a different (consolidation) entity that has to be recorded in the CE. Include here with respect to the CE.	Data Point	Finance / Tax / FP&A			
3.6	Deferred tax booked in a different (consolidation) entity that has to be recorded in the CE. Eliminate here from the Constituent Entity where the items were recorded in books.	Data Point	Finance / Tax / FP&A			
3.61	Items excluded from the computation of GloBE Income or Loss (Chapter 3)	Calculation	Finance / Tax / FP&A	4.4.1(a) + Chapter 3		3.2.4.2.c.3.a
3.62	Reverse DTA on stock-based compensation booked at vest with respect to jurisdictions that have elected to base the deduction on the tax deduction.	Data Point	Finance / Tax / FP&A			
3.63	Reverse DT movement related to pension expense accruals.	Data Point	Finance / Tax / FP&A			
3.64	DTA related to equity gain or loss subject to the Equity Investment Inclusion Election	Data Point	Finance / Tax / FP&A			
3.65	**Disallowed Accruals**	**Calculation**	Finance / Tax / FP&A	4.4.1(b)	21.3.a	
3.66	Deferred tax expense that relates to DTL disallowed accruals	Data Point	Finance / Tax / FP&A			3.2.4.2.c.3.b
3.67	Amount of the reversal that relates to DTL disallowed accruals	Data Point	Finance / Tax / FP&A			3.2.4.2.c.3.h

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
3.68	**(Election) Eliminate Unclaimed Accruals**	Calculation	Tax	4.4.7		3.2.4.3.2.b
3.69	Deferred tax expense with respect to unclaimed accruals	Data Point	Tax	4.4.7		3.2.4.2.c.3.c
3.7	Amount of the reversal that relates to DTL unclaimed accruals	Data Point	Tax	4.4.7		3.2.4.2.c.3.h
3.71	**Re-measurement of Deferred Tax with respect to a change in the applicable domestic tax rate**	**Calculation**	Tax	4.4.1(d)		3.2.4.2.c.3.e
3.72	If the domestic tax rate is reduced, and results in the application of a rate below the Minimum Rate (as well as a reduction in excess of EUR 1M), the amount of remeasurement has to be eliminated from the current year.	Calculation	Tax	4.6.2		3.2.4.2.c.3.k
3.73	Re-measurement with respect to a change in the applicable domestic tax rate (rate increases from a percentage below 15%) - in the year of remeasurement - eliminate the DTL increase	Calculation	Tax	4.6.3		3.2.4.2.c.3.l
3.74	Re-measurement with respect to a change in the applicable domestic tax rate (rate increases from a percentage below 15%) - in the year of release - include the DTL increase previously eliminated	Calculation	Tax	4.6.3		3.2.4.2.c.3.l
3.75	Generation and use of tax credits, except for tax credits on the opening balance sheet of the Transition Year (the first year Pillar 2 applies to a jurisdiction).	Data Point	Tax	4.4.1(e)	-	3.2.4.2.c.3.f
3.76	DTA related to domestic loss creating FTC carry forward in a CFC regime (Substitute Loss Carry Forward)	Calculation	Tax			
3.77	Deferred Tax movement related to qualifying debt release (if elected)	Calculation	Finance / Tax / FP&A	Feb AG 2.4		
3.78	Increased by the amount of any Disallowed Accrual or Unclaimed Accrual paid during the current FY	Data Point	Tax	4.4.2(a)	-	
3.79	Loss Carry Back: The release of a deemed DTA in case a current year loss can be carried back to prior years.	Calculation	Tax			
3.8	The amount of any Recaptured Deferred Tax Liability determined in a preceding FY which has been paid during the FY	Data Point	Tax	4.4.2(b)	21.3.b	3.2.4.2.c.3.i
3.81	DTA attributable to current year losses recognized in Deferred Tax (release or accrual)	Data Point	Tax	4.4.3		
3.82	Current year losses with no corresponding DTA recognized	Data Point	Tax	4.4.2(c)		3.2.4.2.c.3.j
3.83	**Deferred Taxes on Share and asset transactions**	**Calculation**	Finance / Tax	6.2-6.3, 9.1		3.2.4.2.c.3.p
3.84	Business transfer by 3rd Party in an asset deal - no adjustment	Data Point	Finance / Tax			
3.85	Business transfer by 3rd party in a stock deal - remove DT related to purchase price accounting basis	Data Point	Finance / Tax			
3.86	Business transfer by 3rd party in a stock deal treated as an asset sale under Article 6.2.2 (before GloBE rules are in effect) - remove DT related to purchase price accounting basis	Data Point	Finance / Tax			
3.87	Business transfer by 3rd party in a stock deal treated as an asset sale under Article 6.2.2 (after GloBE rules are in effect) - no adjustment	Data Point	Finance / Tax			
3.88	Intercompany asset sale/transfer: common control (before transition period) - include DTA movement in GloBE period	Data Point	Finance / Tax			
3.89	Intercompany asset sale/transfer: no common control (before transition period) - no adjustment	Data Point	Finance / Tax			
3.9	Intercompany asset sale/transfer (during transition period) - remove DT related to step-up basis	Data Point	Finance / Tax			
3.91	Cross-border Intercompany asset sale/transfer: common control (after GloBE rules are in effect) - include DTA movement in GloBE period	Data Point	Finance / Tax			
3.92	Cross-border Intercompany asset sale/transfer: no common control (after GloBE rules are in effect) - no adjustment	Data Point	Finance / Tax			

Ref #	Description	Category	Typical Data Owner	References OECD MR	References EU DIR	References GIR
3.93	**Additional calculation rules regarding the Total Deferred Tax Adjustment Amount**	**Calculation**	Tax			
3.94	If the domestic rate is lower than 15% the DTAs related to losses can be adjusted to 15%. The other DTAs and DTL are recorded at the (lower) domestic rate.	Calculation	Tax			
3.95	Release or expiration of DTA (not included in 'regular' Deferred Tax)	Data Point	Tax	4.4.1(c)		3.2.4.2.c.3.d
3.96	**DTL not paid within the subsequent 5 years (i.e. the current year and the 4 preceding years) has to be reversed in the year it was included in the Total Deferred Tax Adjustment unless related to certain categories of assets (Recapture Exception Accrual). The P2 ETR and the TPT for that year must be recomputed if initially included**	**Calculation**	Tax / FP&A			
3.97	**Alternative B. Globe Loss Election (If the special election applies; the Total Deferred Tax Adj amount doesn't apply)**	**Calculation**	Tax	4.5.1	22	3.2.3.1.a.6.i
3.98	Reverse any Deferred Tax booked in financial accounts (if any)	Data Point	Finance / Tax			
3.99	Amount of GloBE DTA accrued (current year GloBE Loss multipled by 15%)	Calculation	Tax			
3.1	Amount of GloBE DTA utilized (addition to Adjusted Covered Taxes)	Calculation	Tax			
3.101	Additional Top-up Tax Calculation (per jurisdiction)	Calculation	Tax			
3.102	(Election) Carry forward Excess Negative Tax rather than pay CY top-up tax	Data Point	Tax	Feb AG 2.7		
3.103	Excess Negative Tax Carryforwards from prior year	Calculation	Tax	Feb AG 2.7	3.79	3.79

Appendix D
Substance-based Income
Exclusion

Ref #	Description	Category	Typical Data Owner	References OECD MR	References EU DIR	References GIR
4.01	**The Substance-based income exclusion (payroll and tangible asset carve-out) applies by default, but can be opted out of per year/per jurisdiction by election.**	Calculation	Finance / HR			3.3.2.1.5
4.02	Eligible employees (including contractors)	Data Point	Finance / HR		27.1.a	
4.03	Eligible payroll costs (total remuneration including SBC and employer-paid social security and pension)	Data Point	Finance / HR	5.3.3	27.1.b	3.3.2.1.1
4.04	Eligible payroll costs capitalised and included in the eligible tangible asset carve-out base	Data Point	Finance / HR	5.3.3(a)	27.3	3.2.4.4.a.10
4.05	Eligible payroll costs attributable to income that is excluded in accordance with Article 3 (e.g., shipping)	Data Point	Finance / HR	5.3.3(b)	27.3	3.3.2.1.1
4.06	Eligible tangible assets - property, plant and equipment	Data Point	Finance	5.3.4(a)	27.1.c.i	3.3.2.1.3
4.07	Eligible tangible assets - property, plant and equipment: the carrying value of property, including land and buildings, that is held for sale, for lease (see more info) or for investment - after taking into account elimination entries in consolidation	Data Point	Finance	5.3.4	27.4	3.3.2.1.3
4.08	Eligible tangible assets - property, plant and equipment: the carrying value of tangible assets used to derive income that is excluded in accordance with Article 3	Data Point	Finance	5.3.4	27.4	3.2.4.4.a.11
4.09	Eligible tangible assets - natural resources	Data Point	Finance	5.3.4(b)	27.1 c.ii	3.3.2.1.3
4.1	Eligible tangible assets - lessee's right of use of tangible assets (after taking into account elimination entries in consolidation)	Data Point	Finance	5.3.4(c)	27.1 c.iii	3.3.2.1.3
4.11	Eligible tangible assets - subject to revaluation method (as for example IAS 16)	Data Point	Finance	5.3.5		
4.12	Eligible tangible assets - license or similar arrangement from a government for the use of immovable property or exploitation of natural resources that entails significant investment in tangible assets	Data Point	Finance	5.3.4(d)	27.1 c.iv	3.3.2.1.3
4.13	Eligible tangible assets - acquired from another entity within the MNE group	Data Point	Finance			3.3.2.1.3
4.14	Eligible tangible assets - acquired from a 3rd party	Data Point	Finance			3.3.2.1.3

Appendix E
UTPR Allocation Factors
(if UTPR is applicable)

Ref #	Description	Category	Typical Data Owner	References OECD MR	EU DIR	GIR
5.01	Number of employees of all Constituent Entities per jurisdiction that has implemented UTPR, including Permanent Establishments in jurisdiction	Out of System	Legal / HR			3.4.3.3
5.02	Number of employees employed by investment entities in jurisdiction	Out of System	Legal / HR			
5.03	NBV of tangible assets of all Constituent Entities per jurisdiction that has implemented UTPR, including Permanent Establishments in that jurisdiction	Data Point	Finance			3.4.3.4
5.04	NBV of tangible assets owned by investment entities in jurisdiction	Data Point	Finance			

Appendix F
Transitional Safe Harbours

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
6.01	**Qualified CbC Report**	Out of System	Tax	1.13.1		
6.02	Profit (Loss) before Income Tax	Data Point	Finance / Controllership	1.13.1		2.2.1.3.a.2
6.03	Total Revenue	Data Point	Finance / Controllership	1.13.1		2.2.1.3.a.1
6.04	**Qualified Financial Statements**	Out of System	Finance / Controllership	1.13.1		
6.05	Current Tax Expense (excluding taxes that are not Covered Taxes)	Calculation	Finance / Controllership			
6.06	Deferred Tax Expense (excluding taxes that are not Covered Taxes)	Calculation	Finance / Controllership			
6.07	Uncertain Tax Positions	Data Point	Finance / Tax			
6.08	Substance-based Income Exclusion	Calculation	N/A	1.29		

Appendix G
Legend

Column Legend:

Ref # - Data requirement reference number

Description - Represents the data requirement for Pillar Two calculations. Bolded items represent the main adjustments in the Model Rules, and the non-bolded items are the data points that are used to determine the adjustment.

Category - Reflects the type of the data requirement (data point, out of system, calculation).

Typical Data Owner - Reflects which cross-functional group in an organization may 'own' the data requirement. This will likely vary from one organization to another and therefore serves as a general guideline only.

References - Reconciliation of PwC's data requirements to the OECD Model Rules (or commentary where applicable), the EU Directive, and the GloBE Information Return Annex A1.

Abbreviations and acronyms:

CbCR - Country-by-Country Reports

CE - Constituent Entity

CFC - Controlled Foreign Company

CT - Current Tax

DIR - Directive

DT - Deferred Tax

DTA - Deferred Tax Asset

DTL - Deferred Tax Liability

ETR - Effective Tax Rate

EU - European Union

FX - Foreign Exchange

FY - Fiscal Year

GIR - GloBE Information Return

GloBE - Global Anti-Base Erosion

IIR - Income Inclusion Rule

JV - Joint Venture

MNE - Multinational Enterprise

MR - Model Rules

OCI - Other Comprehensive Income

OECD - Organisation for Economic Co-operation and Development

PBT - Profit Before Tax

PE - Permanent Establishment

P&L - Profit and Loss

P2 - Pillar Two

POPE - Partially Owned Parent Entity

UPE - Ultimate Parent Entity

UTP - Uncertain Tax Position

UTPR - Undertaxed Profits Rule

WHT - Withholding Tax