



# Organisation for Economic Co-operation and Development (OECD) released Pillar Two 15% minimum effective tax rate Model Rules

Dear Sir/ Madam,

On 20 December 2021, the Organisation for Economic Co-operation and Development (OECD) released Pillar Two 15% minimum effective tax rate Model Rules.

The Model Rules cover the income inclusion rule (IIR) and undertaxed payments rule (UTPR), collectively referred to as Global Anti-Base Erosion (GloBE). The Model Rules are expected to be brought into law in 2022, to be effective in 2023, with the UTPR to come into effect in 2024.

These Model Rules are the first of three expected sets of guidance: the Model Rules; an explanatory Commentary, expected in January; and a more detailed Implementation Framework, expected in the middle of 2022 at the earliest.

There are now 137 members of the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting (IF), including Kazakhstan, that have signed up to the 8 October statement on a Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy.

Please refer to the attachment for more details.

If you are interested in additional information, please contact us.

