International tax developments

FinanceMalta

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Forces in international tax

Forum on Harmful Tax Practice
BEPS 2.0 – Pillar 2 Global Minimum Tax
EU Code of Conduct Group
Anti-Tax Avoidance Directive 3
State Aid

Public CbCR

Global Forum on Transparency

Reputational risk management

DAC6: Cross-border tax arrangements

IBC/WEF Stakeholder Capitalism report

Global Reporting Initiative 207: Tax

Tax Inspectors Without Borders

Dispute resolution

Uncertain tax positions

Tax Gap

BEPS 1.0 implementation

Tax transparency

Building the global norm

Post COVID-19 response EU own resources package Statutory tax rates

Tax treaties

Need for revenue



Controversy

New regionalism

European Commission
Role of the OECD/IF?
Made in America tax plan

Environment

EU Green Deal

Carbon border adjustment

Plastic packaging taxes

Technology

Digital tax administration
Trading platforms
Cryptocurrency

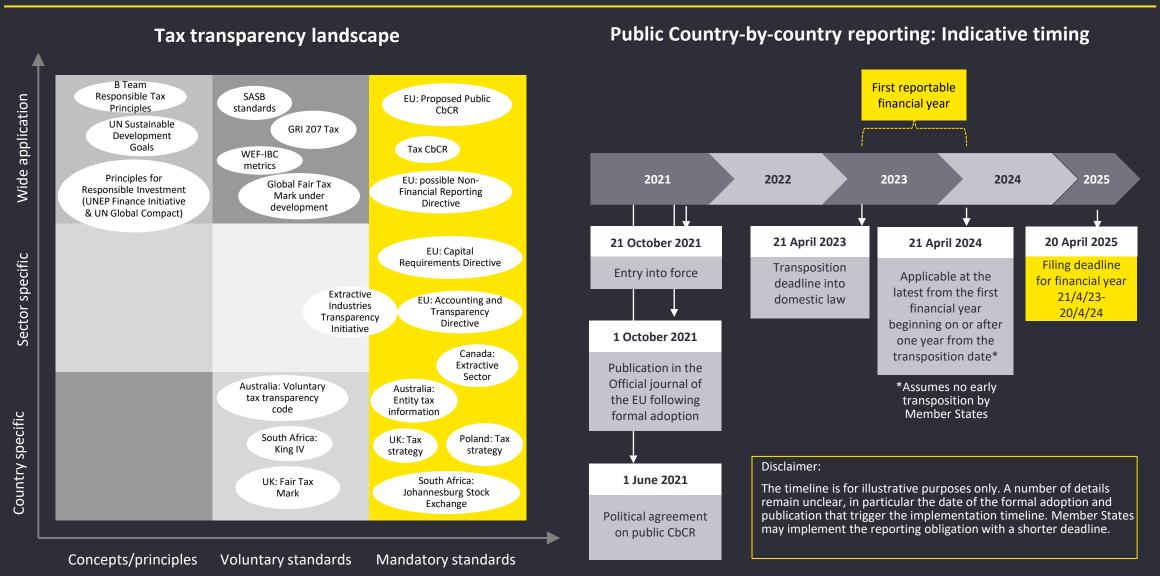
Digital economy

Taxing the digital economy
BEPS 2.0 – Pillar 1
Digital Services Tax



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Tax transparency: EU Public Country-by-country Reporting





Global tax developments: Inclusive Framework and BEPS 2.0

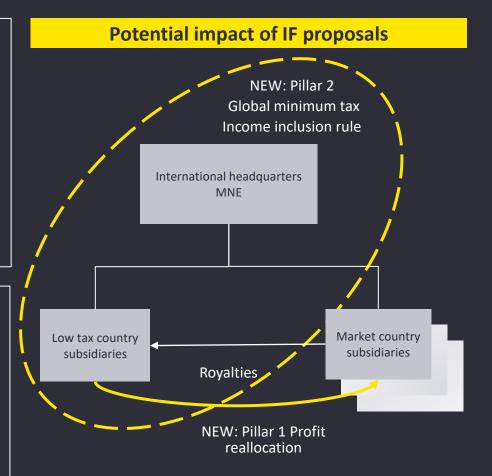
Current developments	2023	Implementation
	2022	Ability to sign up
	Oct 21	Report to G20 Finance Ministers
	Jul 21	'Conceptual agreement' b 131 countries within 139 jurisdictions of IF
	Apr 21	US calls for Global Minimum Tax
BEPS 2.0	2020	OECD releases BEPS 2.0 "blueprints" and economic assessment
	2017- 2020	Discussions leading to BEPS 2.0
BEPS 1.0	2016	Inclusive Framework (IF) created
	2015	BEPS 1.0 reports
	2013	G20 identifies tax avoidance as a priority

Pillar One

- Tax disputes between countries
- Reallocation of profit from legal owner to in-market jurisdictions
- Applies to:
 - Very large MNEs with global turnover above €20 billion, and
 - Profit margin above 10% (i.e. profit before tax/revenue)
- Exemptions for regulated financial services and extractives

Pillar Two

- Global minimum tax
- Tax rate of "at least 15%"
- Targeted at low tax countries
- Applies at least to MNEs with revenues in excess of €750 million
- Exemptions for investment funds/ pension funds





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