

GloBE Intended Adoption —

As at 20 December 2022 — Estimates only

A. Income Inclusion Rule (IIR)

	Draft EU Directive & likely above 12 in-scope MNEs ^(n1&2)		Other firm indications & estimates	Some indication but high uncertainty	Draft EU — likely < 12 in-scope MNEs
	2024 ⁿ³		2024	2024+	2025–2030
43	15		10	6	12
	Belgium (BE)	Austria (AT)	Australia (AU)	Canada (CA)	Bulgaria (BG)
	France (FR)	Czech Republic (CZ)	Hong Kong (HK)	Mauritius (MU)	Croatia (HR)
	Germany (DE)	Denmark (DK)	Indonesia (ID)	Mexico (MX)	Cyprus
	Italy (IT)	Greece (GR)	Japan (JP)	Singapore (SG)	Estonia (EE)
	Netherlands (NL) (DL)	Finland (FI)	Korea (KO) (DL)	South Africa (ZA)	Hungary (HU)
	Spain (ES)	Ireland (IE)	Malaysia (MY)	Thailand (TH)	Latvia (LV)
	Portugal (PO)	Luxembourg (LX)	New Zealand (NZ)		Lithuania (LT)
	Sweden (SE)		Switzerland (CH) (DL)		Malta (MT)
			the UAE (AE)		Romania (RO)
			UK (DL)		Slovenia (SI)
					Slovakia (SK)
					Poland (PL)

Note: DL = Draft Legislation

B. Under-Taxed Payments Rule (UTPR)

	Draft EU Directive & likely above 12 in-scope MNEs		Possibility for adoption in	Possibility for adoption in	Draft EU — likely < 12 in-scope MNEs
	2025		2024+	2025+	2025–2030
43	15		5	11	12
	BE, FR, DE, IT, NL, ES, LX, PO, SE	AT, CZ, DK, GR, FI, IE,	AE, AU, CH, MY, NZ	CA, HK, ID, JP, KO, MU, MX, SG, ZA, TH, UK (2025 at earliest)	BG, HR, CY, EE, HU, LV, LT, MT, RO, SI, SK, PL

C. Qualifying Domestic Minimum Top-up Tax (QDMTT)

	Firm Indication	Position not established
	2024	2024+
43	4 NL, UK, CH, MY	39 AU, AT, BE, BG, CA, HR, CY, CZ, DK, EE, FI, FR, DE, GR, HK, HU, ID, IE, IT, JP, KO, LV, MT, MU, MX, NZ, PL, RO, SG, SK, SL, ZA, ES, SE, TH, AE

Note 1 On December 15, 2022, the Council of the EU reached unanimous agreement to implement the EU Minimum Tax Directive. The agreed text requires Member States to start applying the IIR for fiscal years beginning on or after December 31, 2023. The Directive will enter into force on the day after its publication in the Official Journal of the EU, which is expected shortly.

[Euro Tax Flash from KPMG's EU Tax Centre - KPMG Global \(home.kpmg\)](#)

Note 2 The EU Minimum Tax Directive provides the option for Member States to implement a qualified domestic top-up tax (QDMTT) and to defer the application of the IIR and the UTPR up to December 31, 2029, where a maximum number of 12 UPEs are based in that EU Member State. It is expected that this group will have more than 12 in-scope MNEs and thus will implement the IIR and UTPR for 2024 and 2025 respectively. For some jurisdictions the level of in-scope MNEs is uncertain and has been estimated.

Note 3 References to 2024 and 2025 include starting dates that do not commence on 1 January, but take place throughout the year.

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