

## Deloitte Tax resources address Pillar Two considerations for the C-Suite, M&A activity

The OECD has introduced Pillar Two—an unprecedented approach to addressing perceived base erosion and profit shifting, representing one of the biggest shifts in international taxation in decades. Multinational groups with revenue exceeding 750 million euros must calculate a top-up tax in every jurisdiction where they pay less than 15 percent in taxes and new rules ensure multinational entity groups pay at least 15 percent tax in every jurisdiction in which they operate. The anticipated effective date is January 1, 2024, in varying jurisdictions, and even if top-up taxes are not expected to be material, compliance will add significant time and effort for many companies.

In the M&A sphere, transactions happening now and from 2024 onwards may already impact a multinational group's future Pillar Two position and potential Pillar Two top-up tax liabilities. Therefore, Pillar Two considerations should be factored into a contemplated deal's costs, contractual documentation, and information sharing.

### Find out more

A new 5x5 resource guide from Deloitte Tax LLP identifies five insights that C-Suite leaders need to know about the new Pillar Two rules and five actions they can take now to prepare for their implementation.

**URL:** <https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/us-tax-5x5-pillar-two-considerations-for-the-c-suite.pdf>

A new article from Deloitte Tax discusses what Pillar Two M&A considerations are top-of-mind, who the rules apply to, and what taxpayers can do today to address these rules and considerations.

**URL:** <https://www2.deloitte.com/us/en/pages/tax/articles/m-and-a-tax-talk.html?id=us:2em:3na:tnv:awa:tax:120123&sfid=7015Y000004RoR7QAK>

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