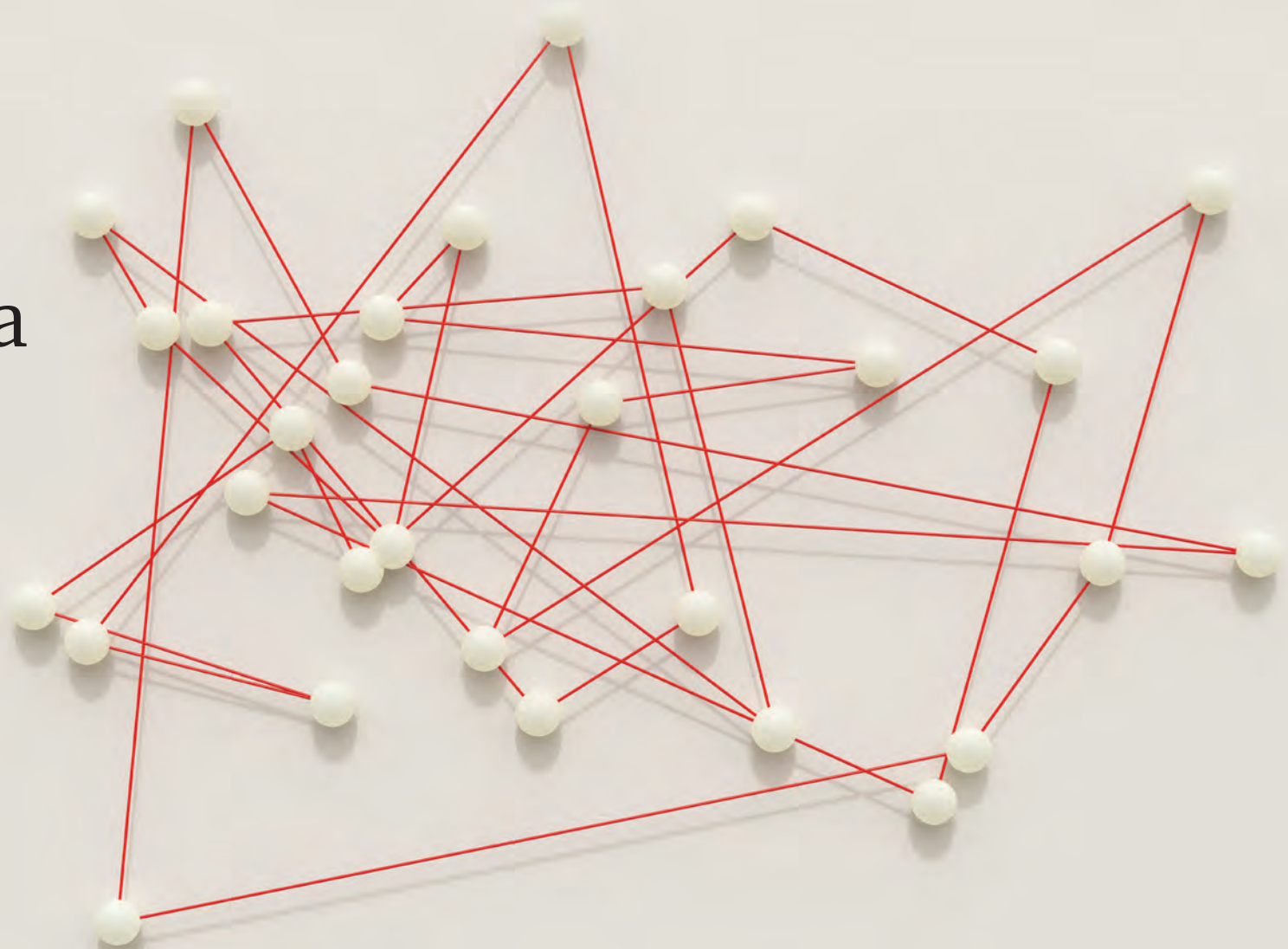




# Pillar Two Data Input Catalog

March 2023



# 1 Executive summary

## 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 Multinational Enterprise Groups (“MNEs”) with consolidated revenue over €750m - Global Anti-Base Erosion (“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 define the scope and key mechanics of the GloBE 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. The country with the top-up tax may instead collect any of that amount itself via a qualified domestic minimum top-up tax (“QDMTT”).

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, while 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; 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



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!

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, 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.

### 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 inevitable result, 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 reach agreement, the OECD expects to release 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, Controllershship, 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, 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

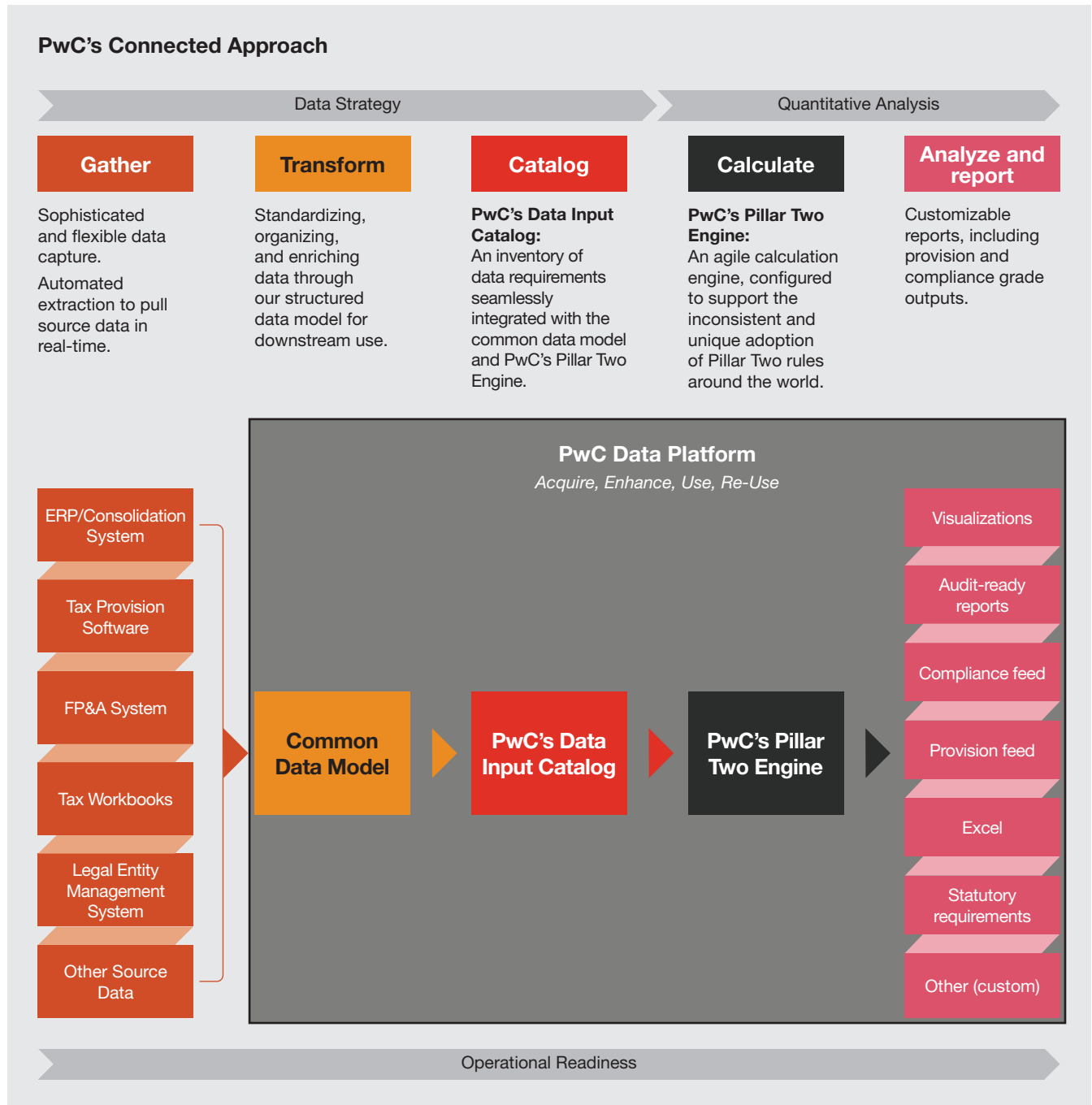
(people and systems) is viewed as the greatest challenge for Pillar Two Readiness.

**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.



# 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 GloBE Information Return (“GIR”). 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”.

PwC’s Pillar Two Engine, a centralized calculation engine with graphical databases, is configured to support the inconsistent and unique adoption of



# 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!

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-evaluate 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:

- 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.
- The stand up of new processes that will be required under Pillar Two.
- The potential benefit of making certain elections available under Pillar Two.
- Modeling to understand both Pillar Two financial impact and process impact on key jurisdictions.
- Assessment of whether it may be beneficial to make operational or structural changes.
- Stakeholder alignment and impacts on the operating model.
- Providing tax policy background to contextualize the data requirements.
- Providing advice on 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, review of disclosures.

### Comply

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

- Support the development and configuration of modeling and compliance solutions using your existing systems or your internally developed solution.
- Utilize PwC's Pillar Two Engine to help reduce the time and cost associated with your future reporting and compliance obligations.
- Documentation of 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 maximize efficiencies and insights, leveraging connected data.

5

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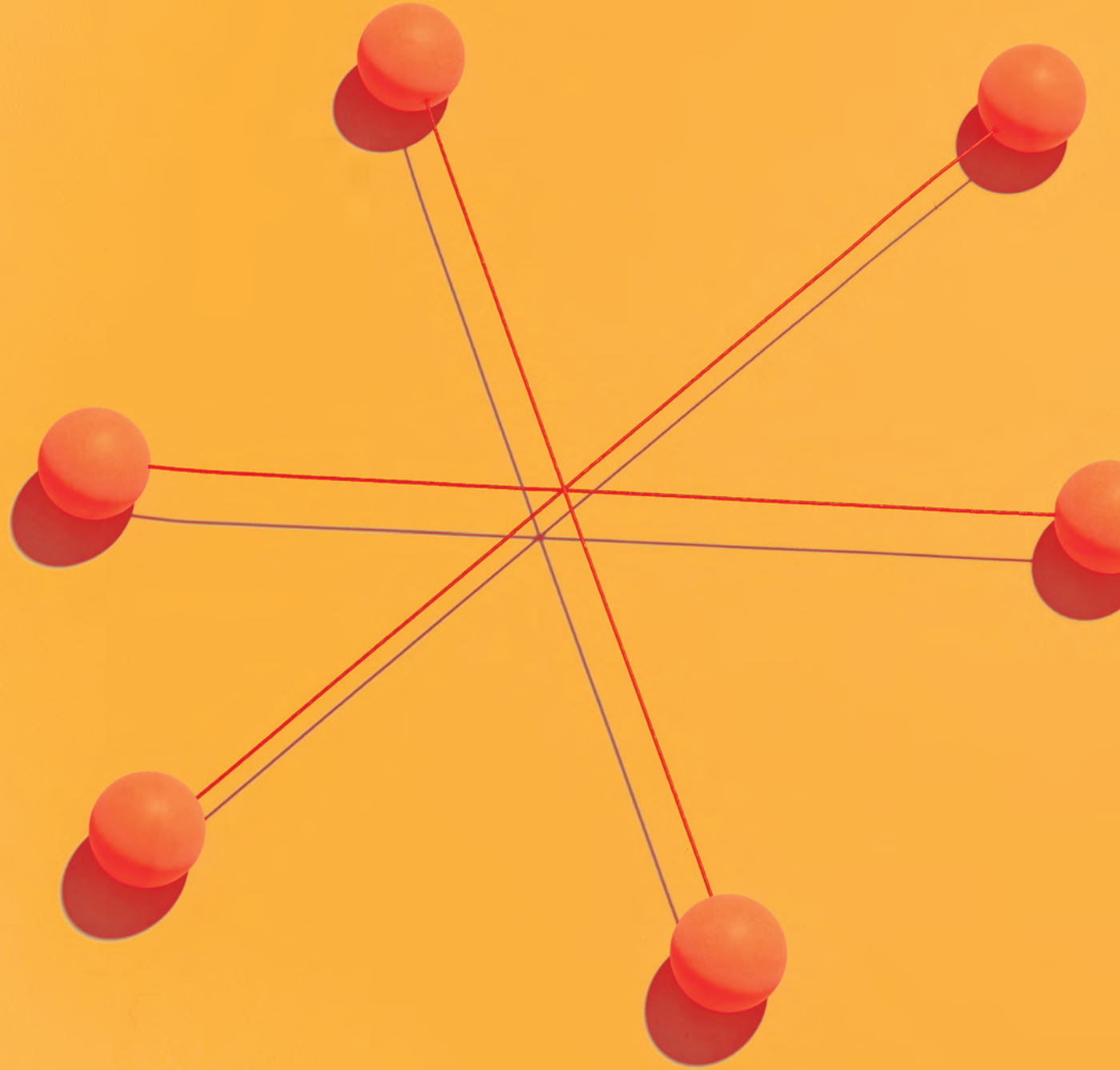
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# Appendix A Constituent Entities

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
1.01	List of Constituent Entities (excluding Permanent Establishments)	Out of System	Legal / Tax	1.3.1(a)	3.2	Master Data
1.02	Legal form	Out of System	Legal / Tax			Master Data
1.03	List of Permanent Establishments	Out of System	Legal / Tax	1.3.1(b)		Master Data
1.04	Tax identification number for each Constituent Entity	Data Point	Legal / Tax	8.1.4(a)	42.5.a	Master Data
1.05	Accounting functional currency	Data Point	Legal / Tax	3.2.1(f)		1.3.3
1.06	Tax functional currency	Data Point	Legal / Tax	3.2.1(f)		3.4.1.a.2.f
1.07	List of Constituent Entities in CFC regime (by UPE)	Out of System	Legal / Tax	4.3.2(c)		3.4.2.b.3
1.08	Controlling interests (in %) of the Ultimate Parent Entity in other Constituent Entities	Out of System	Legal / Tax	8.1.4(b)	42.5.b	2.2.1.10
1.09	Percentage owned by POPE (inclusion ratio)	Out of System	Legal / Tax			2.2.1.10
1.10	Percentage owned by other CEs (not UPE or POPE)	Out of System	Legal / Tax			2.2.1.10
1.11	Percentage owned outside the MNE group (3rd party share)	Out of System	Legal / Tax			2.2.1.10
1.12	In case the CE is bought from or sold to a 3rd party the number of months of ownership (default is 12).	Out of System	Legal / Tax			2.3
1.13	Location for each Constituent Entity (including UPE and POPEs)	Data Point	Legal / Tax	10.3	42.5.a	Master Data
1.14	Designated local entity for each member state	Out of System	Legal / Tax		42.1.a	Master Data
1.15	Tax qualification for all the Constituent Entities: - Incorporated entity CE - Incorporated entity UPE - Incorporated entity POPE - Permanent establishment - Hybrid - Reverse hybrid - Transparent entity - CFC owner	Out of System	Legal / Tax	10.1, 10.2		2.2.1.8
1.16	JV Group / Minority-owned Entity status	Out of System	Legal / Tax	5.6, 6.4		Master Data
1.17	Excluded Entity status	Out of System	Legal / Tax	1.5		2.2.2, 3.4.3.3.b
1.18	Members of a fiscal unity / tax consolidation group? (Y/N)	Out of System	Legal / Tax	3.2.8		Master Data
1.19	Identify Insurance Entities in the Jurisdiction	Out of System	Legal / Tax	3.2.9, 4.2.2(e)		Master Data
1.20	List transactions after 15 November 2021 (EU) and after 1 December 2021 (Model Rules), but before 1 January 2024	Out of System	Finance / Tax	9.1.3		
1.21	List transactions in the current year	Out of System	Finance / Tax			2.3
1.22	Current tax rate	Out of System	Tax			Master Data
1.23	Deferred tax rate	Out of System	Tax			Master Data
1.24	GloBE Revenue (after GloBE adjustments and after consolidation adjustments attributable to intra-group transactions)	Data Point	Tax	5.5.1(a)		3.2.2.2.a
1.25	Consolidated Financial Statements of the UPE (type)	Out of System	Finance	3.1.2		1.3.1
1.26	Financial Accounting standard used for the CFS of the UPE	Out of System	Finance	3.1.2		1.3.2, 3.4.5

# Appendix B

## Computation of GloBE

### Income or Loss



Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
2.01	<b>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.</b>	Calculation	Finance / Controllership	3.1	14.1	3.4.1.a.2
2.02	PEs, Hybrids, Reverse Hybrids, transparent CEs with separate accounts 1. CEs that are incorporated and tax resident in the same jurisdiction, with all accounting entries on the correct entity code; i.e. entity code matches P2 jurisdiction 2. Permanent establishments with their own entity code (i.e. all accounting entries booked on the PE's entity code). 3. Reverse hybrids in jurisdiction of incorporation with their own entity code (i.e. all accounting entries booked on the Reverse Hybrids entity code). 4. Tax transparent UPEs with their own entity code i.e. all accounting entries booked on the transparent UPE's entity code). 5. Hybrids in jurisdiction of incorporation with their own entity code (i.e. all accounting entries booked on the PE's entity code).	Data Point	Finance / Controllership			3.4.1.b
2.03	PEs, Hybrids, Reverse Hybrids, transparent CEs without separate accounts 6. If the transparent entity's accounting entries are all booked on the entity code of another CE, do nothing in DIC with respect to this entity, unless there are multiple CEs and/or third party minority owners. 7. If the transparent entity's accounting entries are all booked on the entity code of another CE and there are other CE owners and / or third party minority owners first fill in the DIC on a line by line basis for the transparent entity, the eliminate the total on a line by line basis from the entity into which the account entries were made. Finally add the pro-rated numbers on a line by line basis to each of the owners. 8. If the transparent entity has its own entity code and accounting entries are booked on that code, first complete the DIC on a line by line basis for the transparent entity and add the pro-rata share DIC of the owner CEs on a line by line basis (this automatically eliminates any 3rd party minority share).	Calculation	Finance / Controllership			3.4.1.b
2.04	If the PE has incurred a loss in the current year	Data Point	Finance / Controllership	3.4.5		3.4.1.b
2.05	If the PE has incurred a loss in a prior year	Data Point	Finance / Controllership	3.4.5		3.4.1.b
2.06	Reverse all profit and loss adjustments related to intra-group transactions	Data Point	Finance / Controllership			3.4.1.a.2.q
2.07	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			3.4.1.a.2.l
2.08	Items booked in a different entity (Group/consolidated financial accounts) related to this entity	Data Point	Finance / Controllership			
2.09	Reverse all items related to purchase accounting (including depreciation) from the CE.	Data Point	Finance / Controllership			
2.10	<b>International Shipping Income Exclusion</b> International shipping income and all related line items need to be: 1. Recorded here on a line by line basis 2. Eliminated from the entity in which these were recorded on a line by line basis.	Data Point	Finance / Controllership	3.3	16	3.4.1.a.2.x, 3.4.4.a

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
2.11	<b>(a) Net Taxes Expense</b>	Calculation	Tax	3.2.1(a), 10.1		3.4.1.a.2.a
2.12	Covered taxes accrued as an expense (above the tax line)	Calculation	Tax			3.4.2.a.2.a
2.13	CT and DT included in income tax expense	Calculation	Tax			3.4.2.a.2.c
2.14	Interest related to Covered Taxes	Calculation	Tax			
2.15	Penalties related to taxes	Calculation	Tax			
2.16	Deferred tax assets attributable to a loss for the fiscal year	Calculation	Tax			3.4.2.a.2.b
2.17	Qualified domestic top-up taxes accrued as an expense	Calculation	Tax			
2.18	Taxes arising pursuant to the rules of this Directive	Calculation	Tax			
2.19	Disqualified refundable imputation taxes accrued as an expense	Calculation	Tax			
2.20	Reverse qualifying tax credit if booked in CT	Data Point	Tax			
2.21	Add back non-qualifying tax credit if booked in PBT	Data Point	Tax			
2.22	<b>(b) Excluded Dividends</b>	Calculation	Finance / Tax	3.2.1(b)	15.1.b	3.4.1.a.2.b
2.23	Non-Portfolio Shareholding	Data Point	Finance / Tax			
2.24	Non-short-term Portfolio Shareholding	Data Point	Finance / Tax			
2.25	Investment Entity subject to 7.6 election	Data Point	Finance / Tax	7.6, 10.1		
2.26	<b>(c) Excluded Equity Gain or Loss</b>	Calculation	Finance / Controllership	3.2.1(c)	15.1.c	3.4.1.a.2.c
2.27	Gains and losses from changes in fair value of an Ownership Interest; except for a disposition of a Portfolio Shareholding	Data Point	Finance / Controllership			
2.28	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			
2.29	Gains and losses from disposition of an Ownership Interest, except for a disposition of a Portfolio Shareholding	Data Point	Finance / Controllership			
2.30	<b>(d) Included Revaluation Method Gain or Loss (changes in value of carrying value of property, plant and equipment included in OCI)</b>	Calculation	Finance / Controllership	3.2.1(d)	15.1.d	3.4.1.a.2.d
2.31	Fair value revaluation gains are recorded in OCI	Data Point	Finance / Controllership			
2.32	Fair value revaluation losses are recorded in OCI	Data Point	Finance / Controllership			
2.33	<b>(e) Gain or loss from disposition of assets and liabilities excluded under Article 6.3</b>	Data Point	Finance / Controllership	3.2.1(e)		3.4.1.a.2.e
2.34	<b>(f) Asymmetric Foreign Currency Gains or Losses</b>	Calculation	Finance / Tax	3.2.1(f)	15.1.e	3.4.1.a.2.f
2.35	FX included in taxable income and caused by difference between tax and accounting functional currency	Data Point	Finance / Tax			
2.36	FX included in accounting income and caused by the difference between tax and accounting functional currency	Data Point	Finance / Tax			
2.37	FX fluctuation between a (third) foreign currency and the accounting functional currency	Data Point	Finance / Tax			

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
2.38	FX fluctuation between a (third) foreign currency and the tax functional currency	Data Point	Finance / Tax			
2.39	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			
2.40	PLACEHOLDER - results on equity hedges, including hedges on foreign CEs, in case they qualify for participation exemption.	Calculation	Finance / Tax			
2.41	<b>(g) Policy Disallowed Expenses</b>	Calculation	Finance / Controllership	3.2.1(g)	15.1.f	3.4.1.a.2.g
2.42	Expenses accrued by the Constituent Entity for illegal payments, including bribes and kickbacks	Data Point	Finance / Controllership			
2.43	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			
2.44	<b>(h) Prior Period Errors and Changes in Accounting Principles</b>	Calculation	Finance / Tax	3.2.1(h)	15.1.g	3.4.1.a.2.h, 3.4.1.a.2.i
2.45	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			
2.46	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			
2.47	<b>(i) Accrued Pension Expense</b>	Calculation	Finance / Controllership	3.2.1(i)	15.1.h	3.4.1.a.2.j
2.48	Amount of pension liability expense included in the Financial Accounting Net Income or Loss	Data Point	Finance / Controllership			
2.49	Amount contributed to a Pension Fund for the Fiscal Year	Data Point	Finance / Controllership			
2.50	<b>Income reallocated in the context of Pillar One (Amount A)</b>	Data Point	Tax			
2.51	<b>Arm's length principle adjustments</b>	Calculation	Finance / Tax			3.4.1.a.2.l, 3.4.1.c
2.52	Transactions between Constituent Entities located in different jurisdictions	Data Point	Finance / Tax	3.2.3		
2.53	Transactions between Constituent Entities located in the same jurisdiction resulting in a loss to the transferor.	Data Point	Finance / Tax	3.2.3		
2.54	Transactions between Constituent Entities and Minority-owned Constituent Entities	Data Point	Finance / Tax			
2.55	<b>Qualified Refundable Tax Credits &amp; non-qualifying tax credits</b>	Calculation	Tax	3.2.4	15.5	3.4.1.a.2.m
2.56	Qualifying Tax Credit is included in PBT	Data Point	Tax			
2.57	Qualifying Tax Credit is included in Current Tax	Data Point	Tax			
2.58	Non-Qualifying Tax Credit is included in PBT	Data Point	Tax			
2.59	Non-Qualifying Tax Credit in Current Tax	Data Point	Tax			
2.60	<b>Low-Tax Entity intragroup financing arrangement</b>	Calculation	Tax	3.2.7	15.8	3.4.1.a.2.p, 3.4.1.c

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
2.61	<b>(Election) Stock based compensation</b>	Calculation	Finance / Tax	3.2.2	15.3	3.3.3.1.3.d, 3.4.1.a.2.k
2.62	Stock based compensation expense included in Financial Accounting Net Income or Loss	Data Point	Finance / Tax	3.2.2	15.3	
2.63	Stock based compensation deducted for tax purposes	Data Point	Finance / Tax			
2.64	Previously deducted stock-based compensation expense of options that have been expired without exercise	Data Point	Finance / Tax			
2.65	PLACEHOLDER - Adjustment for the Financial Year election is made / revoked	Calculation	Finance / Tax			
2.66	PLACEHOLDER - In case the election is made after SBC related expenses have been included in GloBE Income, but have not yet been deducted for tax purposes	Calculation	Finance / Tax			
2.67	<b>(Election) Use of the realization method in lieu of fair value or impairment accounting</b>	Calculation	Finance / Tax	3.2.5		3.3.3.1.3.e, 3.4.1.a.2.n
2.68	Gains or losses attributable to fair value or impairment accounting	Data Point	Finance / Tax			
2.69	Actual realization of gain or loss	Data Point	Finance / Tax			
2.70	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 / Tax			
2.71	<b>(Election) Aggregate Asset Gain</b>	Calculation	Finance / Tax	3.2.6	15.7	3.3.3.1.1.a, 3.4.1.a.2.o
2.72	<b>(Election) Tax consolidation group adjustments</b>	Calculation	Finance / Tax	3.2.8	15.9	3.3.3.1.3.f, 3.4.1.a.2.q
2.73	Group elimination adjustments (income)	Calculation	Finance / Tax			
2.74	Group elimination adjustments (expense)	Calculation	Finance / Tax			
2.75	Group elimination adjustments (gain)	Calculation	Finance / Tax			
2.76	Group elimination adjustments (loss)	Calculation	Finance / Tax			
2.77	<b>Insurance company specific deductions/additions</b>	Calculation	Finance / Tax	3.2.9	15.10	3.4.1.a.2.r
2.78	Amounts charged to policyholders for taxes paid by the insurance company in respect of returns to the policyholders	Data Point	Finance / Tax			
2.79	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			
2.80	<b>Equity increase/decrease attributable to distributions paid or payable in respect of additional Tier One Capital</b>	Calculation	Finance / Tax	3.2.10	15.11	3.4.1.a.2.s
2.81	Issuer of Additional Tier One / distributions paid or payable	N/A	Finance / Tax			
2.82	(i) Amounts recognized as an increase to the equity	Data Point	Finance / Tax			
2.83	(ii) Amounts recognized as an expense	Data Point	Finance / Tax			
2.84	Subscriber of Additional Tier One / distributions paid or payable	N/A	Finance / Tax			
2.85	(i) Amounts recognized as an increase to the equity	Data Point	Finance / Tax			
2.86	(ii) Amounts recognized as an expense	Data Point	Finance / Tax			
2.87	PLACEHOLDER - Conversion or write-off in the books of the Issuer	Data Point	Finance / Tax			
2.88	PLACEHOLDER - Conversion or write-off in the books of the Subscriber	Data Point	Finance / Tax			



Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
2.89	<b>Adjustments for Chapter 7 - Tax neutrality and distribution regimes</b>	Calculation	Tax	3.2.11 - ref to Chapter 7		3.4.1.a.2.t, 3.4.1.d
2.90	Flow-through Entity reduction (UPE)	Out of System	Tax	7.1.1		3.4.1.a.2.u
2.91	Deductible Dividend Regime reduction (UPE)	Out of System	Tax	7.2.1		3.4.1.a.2.v
2.92	(Election) Eligible Distribution Tax Systems	Out of System	Tax	7.3		3.3.3.2.1
2.93	(Election) Investment Entity Tax Transparency	Out of System	Tax	7.5		3.4.1.a.2.w, 3.4.3.3.c
2.94	(Election) Taxable Distribution Method Election	Out of System	Tax	7.6		3.4.3.3.d
2.95	<b>Share and asset transactions</b>	Calculation	Finance / Tax	6.2-6.3, 9.1		
2.96	Business transfer by 3rd Party in an asset deal	Data Point	Finance / Tax			
2.97	Business transfer by 3rd party in a stock deal	Data Point	Finance / Tax			
2.98	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)	Data Point	Finance / Tax			
2.99	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)	Data Point	Finance / Tax			
2.100	Intercompany asset sale/transfer: common control (before transition period)	Data Point	Finance / Tax			
2.101	Intercompany asset sale/transfer: no common control (before transition period)	Data Point	Finance / Tax			
2.102	Intercompany asset sale/transfer (during transition period)	Data Point	Finance / Tax			
2.103	Cross-border Intercompany asset sale/transfer: common control (after GloBE rules are in effect)	Data Point	Finance / Tax			
2.104	Cross-border Intercompany asset sale/transfer: no common control (after GloBE rules are in effect)	Data Point	Finance / Tax			



# Appendix C

## Computation of Adjusted Covered Taxes

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
3.01	<b>Current tax expense accrued in Financial Accounting Net Income or Loss with respect to Covered Taxes for the Fiscal Year</b> 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	3.4.2.a.2.a
3.02	Tax imposed under a CFC regime on the CE	Calculation	Tax	4.3.2(c)		
3.03	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		
3.04	Passive Income that is includible under the fiscal transparency rule 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	Covered Taxes allocated to a Hybrid Entity by a Constituent Entity-owner in respect of Passive Income	Data Point	Tax	4.3.3		
3.07	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			
3.08	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		
3.09	Highest corporate tax rate on ordinary income in the jurisdiction of the Main Entity where GloBE Income of a PE is treated as GloBE Income of the Main Entity	Data Point	Tax	4.3.4		
3.10	Tax on distributed profits (transfer from receiving to paying entity)	Data Point	Tax	4.2.1(a)		
3.11	Tax paid by recipient on income that is exempt under GloBE rules	Data Point	Tax	4.2.1(a)		
3.12	Taxes on distributed profits, deemed profit distributions, and non-business expenses imposed under an Eligible Distribution Tax System	Calculation	Tax	4.2.1(b)		
3.13	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)		
3.14	Taxes or surcharges on specific activities	Data Point	Tax			
3.15	IIR Top-up Tax accrued by parent	Data Point	Tax	4.2.2(a)		4.1.2
3.16	Qualified Domestic Top-up tax	Data Point	Tax	4.2.2(b)		3.3.1.5
3.17	UTPR taxes	Data Point	Tax	4.2.2(c)		4.1.3
3.18	Disqualified Refundable imputation tax	Data Point	Tax	4.2.2(d)		
3.19	Taxes paid by an insurance company with respect to returns to policyholders	Data Point	Tax	4.2.2(e)		3.4.1.a.2.r
3.20	Interest related to Covered Taxes	Data Point	Tax			
3.21	Penalties related to taxes	Data Point	Tax			
3.22	<b>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</b>	Calculation	Tax	4.1.1	20	3.4.2.a.2.q
3.23	<b>Additions to covered taxes of a Constituent Entity</b>	Calculation	Tax	4.1.2		
3.24	Covered tax accrued as expense	Data Point	Tax	4.1.2(a)		3.4.2.a.2.a
3.25	(Election) Amount of qualifying loss DTA used	Data Point	Tax	4.1.2(b)		3.4.2.a.2.b
3.26	Amount of UTP previously excluded and paid in the current year (excluding interest & penalties)	Calculation	Tax	4.1.2(c)		3.4.2.a.2.c

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
3.27	Amount of interest and penalties included in the UTP payment above (eliminate)	Calculation	Tax			3.4.2.a.2.c
3.28	Amount of Qualified Refundable Tax Credit accrued as a reduction of tax expense	Calculation	Tax	4.1.2(d)	20.2	3.4.2.a.2.d
3.29	<b>Reductions to covered taxes of a Constituent Entity (4.1.3)</b>	Calculation	Tax	4.1.3	20.3	
3.30	Tax related to excluded income or loss under Chapter 3	Data Point	Tax	4.1.3(a)		3.4.2.a.2.e
3.31	Non-Qualified Refundable Tax Credit not treated as a reduction to current tax expense	Data Point	Tax	4.1.3(b)		3.4.2.a.2.f
3.32	Tax credit or refund, except for any Qualified Refundable Tax Credit, that was not treated as a reduction of tax expense	Data Point	Tax	4.1.3(c)		3.4.2.a.2.g
3.32 (a)	Tax refund that was not treated as a reduction of tax expense if more than 1M EUR per jurisdiction per year (use this cell in case a recalculation of a prior year has to be done in FY+3)	Data Point	Tax	4.6.1		
3.33	Amount of tax expense related to UTP	Calculation	Tax	4.1.3(d)		3.4.2.a.2.h
3.34	Amount of tax expense (not expected) to be paid within 3 years	Data Point	Tax	4.1.3(e)		3.4.2.a.2.i
3.35	All Taxes included in Covered Taxes in FY-3 that have not been paid by the end of the current Fiscal Year	Data Point	Tax	4.1.3(e)		
3.35 (a)	All Taxes included in Covered Taxes that have not been paid within three years in excess of 1M per year per jurisdiction (use this cell in case a recalculation of a prior year has to be done in FY+3)	Calculation	Tax	4.6.1		
3.36	<b>Post filing adjustments</b> (i.e. adjusted after the return with respect to that year was filed.)	Calculation	Tax	4.6	24	3.4.2.a.2.j
3.37	Post filing adjustments - increase	Calculation	Tax	4.6.1		
3.38	(Election) Post filing adjustments - decrease < 1M EUR per jurisdiction per year	Calculation	Tax	4.6.1		
3.39	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		
3.40	<b>Deferred Tax Alternative A: Total Deferred Tax Adjustment Amount</b>	Calculation	Finance / Tax / FP&A	4.4	21	3.4.2.a.2.p
3.41	Deferred tax expense accrued in the CE's financial accounts	Calculation	Finance / Tax / FP&A	4.4.1	21.2	3.4.2.c.2
3.42	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			
3.43	Deferred tax booked in a different (consolidation) entity that has to be recorded in the CE. Eliminate here from the entity where the items were recorded in books	Data Point	Finance / Tax / FP&A			
3.44	Items excluded from the computation of GloBE Income or Loss (Chapter 3)	Calculation	Finance / Tax / FP&A	4.4.1(a) + Chapter 3		3.4.2.c.3.a
3.45	Disallowed Accruals	Calculation	Finance / Tax / FP&A	4.4.1(b)	21.3.a	
3.46	Deferred tax expense that relates to DTL disallowed accruals	Calculation	Finance / Tax / FP&A			3.4.2.c.3.b
3.47	Amount of the reversal that relates to DTL disallowed accruals	Calculation	Finance / Tax / FP&A			3.4.2.c.3.g
3.48	<b>(Election) Eliminate Unclaimed Accruals</b>	Calculation	Tax	4.4.7		3.4.3.2.a
3.49	Deferred tax expense with respect to unclaimed accruals	Data Point	Tax	4.4.7		3.4.2.c.3.c
3.50	Amount of the reversal that relates to DTL unclaimed accruals	Data Point	Tax	4.4.7		3.4.2.c.3.g

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
3.51	<b>Re-measurement with respect to a change in the applicable domestic tax rate</b>	Calculation	Tax	4.4.1(d)		3.4.2.c.3.e
3.52	If the domestic tax rate is reduced, and results in the application of a rate below the Minimum Rate (or reduction in excess of EUR 1M), the amount of remeasurement has to be eliminated from the current year	Calculation	Tax	4.6.2		3.4.2.c.3.j
3.53	Include here the amount of remeasurement that was eliminated to perform the recalculation in the year that the DTL accrual was made	Calculation	Tax			
3.54	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		3.4.2.c.3.k
3.55	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		3.4.2.c.3.k
3.56	Generation and use of tax credits	Calculation	Tax	4.4.1(e)		3.4.2.c.3.f
3.57	Increased by the amount of any Disallowed Accrual or Unclaimed Accrual paid during the FY	Calculation	Tax	4.4.2(a)		
3.58	Loss Carry Back: The release of a deemed DTA in case a current year loss can be carried back to prior years.	Calculation	Tax			
3.59	The amount of any Recaptured Deferred Tax Liability determined in a preceding FY which has been paid during the FY	Calculation	Tax	4.4.2(b)	21.3.b	3.4.2.c.3.h
3.60	DTA attributable to current year losses recognized in Deferred Tax (release or accrual)	Calculation	Tax	4.4.3		
3.61	DTA with regard to current year losses not recognized in Deferred Tax	Calculation	Tax	4.4.2(c)		3.4.2.c.3.i
3.62	<b>Share and asset transactions</b>	Calculation	Finance / Tax	6.2-6.3, 9.1		3.4.2.c.3.l
3.63	Business transfer by 3rd Party in an asset deal	Data Point	Finance / Tax			
3.64	Business transfer by 3rd party in a stock deal	Data Point	Finance / Tax			
3.65	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)	Data Point	Finance / Tax			
3.66	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)	Data Point	Finance / Tax			
3.67	Intercompany asset sale/transfer: common control (before transition period)	Data Point	Finance / Tax			
3.68	Intercompany asset sale/transfer: no common control (before transition period)	Data Point	Finance / Tax			
3.69	Intercompany asset sale/transfer (during transition period)	Data Point	Finance / Tax			
3.70	Cross-border Intercompany asset sale/transfer: common control (after GloBE rules are in effect)	Data Point	Finance / Tax			
3.71	Cross-border Intercompany asset sale/transfer: no common control (after GloBE rules are in effect)	Data Point	Finance / Tax			
3.72	<b>Additional calculation rules regarding the Total Deferred Tax Adjustment Amount</b>	Calculation	Tax			
3.73	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			
3.74	Release of Pillar Two DTA (not included in 'regular' Deferred Tax)	Data Point	Tax	4.4.1(c)		3.4.2.c.3.d
3.75	<b>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. The P2 ETR and the Top-up Tax for that year must be recomputed if initially included</b>	Calculation	Tax / FP&A			3.3.2.2
3.76	<b>Alternative B. GloBE Loss Election (If the special election applies; the Tot Def Tax Adj amount doesn't apply)</b>	Calculation	Tax	4.5.1	22	3.3.3.1.5.g
3.77	<b>Additional Top-up Tax Calculation (per jurisdiction)</b>	Calculation	Tax			
3.78	(Election) Additional Top-up Tax regarding recomputation of a prior year as a result of a Post-Filing adjustment that results in an aggregate decrease of Covered Taxes of less than EUR 1 million	Calculation	Tax	4.6.1		3.3.3.1.1.b
3.79	Tax loss in excess of P&L loss. Negative Adjusted Covered Tax in excess of 15% of the Globe Profit/Loss	Calculation	Tax			

# Appendix D

## Substance-based Income Exclusion

Ref #	Description	Category	Typical Data Owner	References		
				OECD MR	EU DIR	GIR
4.01	<b>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</b>	Calculation	Finance / HR			3.3.1.3
4.02	Eligible employees	Data Point	Finance / HR		27.1.a	3.3.1.3.a.1
4.03	Eligible payroll costs	Data Point	Finance / HR		27.1.b	3.3.1.3.a.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	3.3.1.3.a.1
4.05	Eligible payroll costs attributable to income that is excluded in accordance with Article 16 (shipping)	Data Point	Finance / HR		27.3	3.3.1.3.a.1
4.06	Eligible tangible assets - property, plant and equipment	Data Point	Finance	5.3.4(a)	27.1.c.i	3.3.1.3.a.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 or for investment	Data Point	Finance		27.4	3.3.1.3.a.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 16	Data Point	Finance		27.4	3.3.1.3.a.3
4.09	Eligible tangible assets - natural resources	Data Point	Finance	5.3.4(b)	27.1.c.ii	3.3.1.3.a.3
4.10	Eligible tangible assets - lessee's right of use of tangible assets	Data Point	Finance	5.3.4(c)	27.1.c.iii	3.3.1.3.a.3
4.11	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	3.3.1.3.a.3
4.12	Eligible tangible assets - acquired from another entity within the MNE group	Data Point	Finance			3.3.1.3.a.3
4.13	Eligible tangible assets - acquired from a 3rd party	Data Point	Finance			3.3.1.3.a.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 that jurisdiction	Out of System	Legal / HR			4.2.3
5.02	Net book value of tangible assets of all Constituent Entities per jurisdiction that has implemented UTPR, including Permanent Establishments in that jurisdiction	Data Point	Finance			4.2.4



# 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	Qualified Financial Statements	Out of System	Finance / Controllership	1.13.1		
6.03	Profit (Loss) before Income Tax	Data Point	Finance / Controllership	1.13.1		3.2.1.3
6.04	Total Revenue	Data Point	Finance / Controllership	1.13.1		3.2.1.2
6.05	Simplified Covered Taxes	Data Point	Finance / Tax	1.2		3.2.1.4
6.06	Simplified ETR	Calculation	N/A	1.2		
6.07	Transition Rate	Out of System	Tax	1.2		
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



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