



(*) Information based on laws, bills or official announcements at the date of this document. "No" also includes cases where the year of entering into force is uncertain

Summary				Year 2024 (*)			Year 2025 (*)			Year 2026 (*)		
Region	Territory	Joined the Pillar Two Statement	Status of implementation	IIR	UTPR	(Q)DMTT	IIR	UTPR	(Q)DMTT	IIR	UTPR	(Q)DMTT
Europe	Albania	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Angola	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Antigua and Barbuda	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Argentina	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Eurasia	Armenia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	Australia	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Austria	Yes	In force No public announcement	Yes	No No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Eurasia Americas	Azerbaijan Bahamas	Yes Yes	In force	No No	No No	No Yes	No No	No No	No Yes	No No	No No	No Yes
Middle East	Bahrain	Yes	In force	No	No	No	No	No	Yes	No	No	Yes
Americas	Barbados	Yes	In force	No	No	Yes	No	No	Yes	No	No	Yes
Europe	Belgium	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Americas	Bermuda	Yes	In progress	No	No	No	No	No	No	No	No	No
Americas	Bolivia	No	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Bosnia and	Yes	No public announcement	No	No	No	No	No	No	No	No	No
	Herzegovina	Vaa		NIa	Na	Nia	NIa	Nia	V	NIa	Na	V
Americas	Brazil British Virgin	Yes	In force	No 	No 	No 	No 	No	Yes	No 	No 	Yes
Americas	Islands	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Bulgaria	Yes	In force	Yes	No No	Yes No	Yes	Yes No	Yes No	Yes No	Yes	Yes No
Africa Americas	Cameroon Canada	Yes Yes	No public announcement In force	No Yes	No No	Yes	No Yes	Yes	Yes	Yes	No Yes	Yes
Africa	Canada Cape Verde	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Cayman Islands	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Chile	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	China	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Colombia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Costa Rica	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Croatia	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Cyprus	No	In force	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes
Europe Africa	Czech Republic DR Congo	Yes Yes	In force No public announcement	Yes No	No No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No
Europe	Denmark	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Americas	Dominica	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Dominican Republic	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Ecuador	No	No public announcement	No	No	No	No	No	No	No	No	No
Americas	El Salvador	No	No public announcement	No	No	No	No	No	No	No	No	No
Middle East	Egypt	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Estonia	Yes	In progress (six-year extension)	No	No	No	No	No	No	No	No	No
Africa	Eswatini	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Finland	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	France	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Eurasia -	Georgia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe Europe	Germany Gibraltar	Yes Yes	In force In force	Yes No	No No	Yes Yes	Yes Yes	Yes No	Yes Yes	Yes Yes	Yes No	Yes Yes
Europe	Greece	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Greenland	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Guatemala	No	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Guernsey	Yes	In force	No	No	No	Yes	No	Yes	Yes	No	Yes
Americas	Honduras Hong Kong SAR,	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	China (*)	Yes	In force	No	No	No	Yes	No	Yes	Yes	No	Yes
Europe Europe	Hungary	Yes	In force	Yes No	No No	Yes No	Yes Yes	Yes No	Yes Yes	Yes Yes	Yes No	Yes Yes
Asia Pacific	Iceland India	Yes Yes	In progress No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	Indonesia	Yes	In force	No	No	No	Yes	No	Yes	Yes	Yes	Yes
Europe	Ireland	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Isle of Man	Yes	In force	No	No	No	Yes	No	Yes	Yes	No	Yes
Middle East	Israel	Yes	In progress	No	No	No	No	No	No	No	No	Yes
Europe	Italy	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Americas	Jamaica	Yes	In progress	No	No	No	No	No	No	No	No	No
Asia Pacific	Japan	Yes	In force	Yes	No	No	Yes	No	No	Yes	Yes	Yes
Europe	Jersey	Yes	In force	No	No	No	Yes	No	Yes	Yes	No	Yes
Middle East	Jordan	Yes	No public announcement	No No	No No	No No	No No	No No	No No	No No	No No	No No
Eurasia Africa	Kazakhstan Kenya	Yes No	No public announcement In force	No No	No No	No No	No No	No No	No Yes	No No	No No	No Yes
Europe	Kosovo	No	No public announcement	No	No	No No	No	No	No	No	No	No Yes
Middle East	Kuwait	No	In force	No	No	No	No	No	Yes	No	No	Yes
Europe	Latvia	Yes	No public announcement	No	No	No	No	No	No	No	No	No

Africa	Liberia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Liechtenstein	Yes	In force	Yes	No	Yes	Yes	No	Yes	Yes	No	Yes
Europe	Lithuania	Yes	In progress (six-year	No	No	No	No	No	No	No	No	No
		<u> </u>	extension)				<u>:</u>					
Europe	Luxembourg	Yes	In force	Yes	No No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Asia Pacific	Malaysia	Yes	In force In progress (six-year	No	No	No	Yes	No	Yes	Yes	No	Yes
Europe	Malta	Yes	extension)	No	No	No	No	No	No	No	No	No
Africa	Mauritius	Yes	In progress	No	No	No	No	No	No	No	No	No
Americas	Mexico	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Moldova	No	No public announcement	No	No	No	No	No	No	No	No	No
Eurasia	Mongolia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Montenegro	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Mozambique	No	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Namibia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Netherlands	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Asia Pacific	New Zealand	Yes	In force	No	No	No	Yes	Yes	No	Yes	Yes	Yes
Americas	Nicaragua	No	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Nigeria	No	In progress	No	No	No	No	No	No	No	No	No
Europe	North Macedonia	Yes	In force	No	No	Yes	No	No	Yes	No	No	Yes
Europe	Norway	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Middle East	Oman	Yes	In force	No	No	No	Yes	No	No	Yes	No	No
Asia Pacific	Pakistan	No	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Panama	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	Papua New Guinea	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Paraguay	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Peru	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	Philippines	No	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Poland	Yes	In force	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Portugal	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Americas	Puerto Rico	No	In progress	No	No	No	No	No	No	No	No	No
Middle East		Yes	In force			***************************************	÷		?	***************************************	!	?
	Qatar	<u></u>	miorce	No	No	No	No	No	Yes	No	No	Yes
Africa	Republic of Congo	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Romania	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Americas	Saint Kitts and	Yes	No public announcement	No	No	No	No	No	No	No	No	No
	Nevis						Į			<u></u>		
Americas	Saint Lucia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Americas	Saint Vincent and the Grenadines	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Middle East	Saudi Arabia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Senegal	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Serbia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Sierra Leone	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	Singapore	Yes	In force	No	No	No	Yes	No	Yes	Yes	No	Yes
Asia Pacific	Seychelles	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Slovakia	Yes	In force	No	No	Yes	No	No	Yes	No	No	Yes
Europe	Slovenia	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Africa	South Africa	Yes	In force	Yes	No	Yes	Yes	No	Yes	Yes	No	Yes
Asia Pacific	South Korea		In force	Yes	No	No	Yes	Yes	No	Yes	Yes	No
Europe	Spain	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Sweden		In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Switzerland	Yes	In force	No	No	Yes	Yes	No	Yes	Yes	No	Yes
Asia Pacific	Taiwan	No	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	Thailand	Yes	In force	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes
Americas	Trinidad and	Yes	No public announcement	No	No	No	No	No	No	No	No	No
	Tobago						<u>:</u>					
Africa -	Tunisia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Europe	Turkey	Yes	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Europe	Ukraine	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Uganda	No	No public announcement	No	No	No	No	No	No	No	No	No
Middle East	United Arab	Yes	In force	No	No	No	No	No	Yes	No	No	Yes
Europe	Emirates United Kingdom	Vac	In force	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Americas	United States	Yes Yes	In force No public announcement	No	No	No Yes	No	No Yes	No	No	No Yes	No Yes
Americas	Uruguay	÷	In progress	No	No	No	No	No No	No	No	No No	Yes
Eurasia	Uzbekistan	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Asia Pacific	Vietnam	Yes	In force	Yes	No	Yes	Yes	No	Yes	Yes	No	Yes
Africa	Zambia	Yes	No public announcement	No	No	No	No	No	No	No	No	No
Africa	Zimbabwe	·	In force	No	No	Yes	No	No	Yes	No	No	Yes
Total		110	11110106	31	0	35	46	30	53	46	32	57
						, 55	70	, 50		1 70		, J,

(*) Law pending to be gazetted

Please check PwC's Pillar Two Country Tracker for further details

Total territories with laws in force	55
In progress (incl. six-year extension)	12
Total territories with no public announcement	64

Last update: 12 June 2025

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PwC's Pillar Two Country Tracker



(*) This chart reflects dates of entry into force (**) To be confirmed whether the proposed minimum tax qualifies as QDMTT (#) Transitional Qualified Status

Territory	IIR (*)	UTPR (*)	QDMTT / DMTT (*) (**)	Transitional Safe Harbour	Permanent Safe Harbour	Status of enactment	PwC Thought Leadership (last publication)
Angola	No public announcement yet	No public announcement yet	No public announcement yet				
Cameroon	No public announcement yet	No public announcement yet	No public announcement yet				
Cape Verde	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
DR Congo	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Eswatini	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Kenya	No public announcement yet	No public announcement yet	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	Highlights of the Tax Laws Amendment Act
Liberia	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Mauritius	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	Pillar Two plans announced	National Budget 2025 - 2026
Mozambique	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Namibia	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Nigeria	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	Pillar Two plans announced	
Republic of Congo	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Senegal	No public announcement yet	No public announcement yet	No public announcement yet				
Sierra Leone	No public announcement yet	No public announcement yet	No public announcement yet				
South Africa	1 January 2024	No public announcement yet	1 January 2024	Yes	No public announcement yet	Final law in force	Tax Alert Budget 2024 — For Our Humanity
Tunisia	No public announcement yet	No public announcement yet	No public announcement yet				
Uganda	No public announcement yet	No public announcement yet	No public announcement yet				
Zambia	No public announcement yet	No public announcement yet	No public announcement yet				
Zimbabwe	No public announcement yet	No public announcement yet	1 January 2024	No public announcement yet	No public announcement yet	Final law in force	
				Total te	rritories with laws in force	3	
					draft / public consultation	0	
			Total		ments but not draft law yet	2	
				Total territories wit	h no public announcement	14	

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PwC's Pillar Two Country Tracker



Europe

(*) This chart reflects dates of entry into force
(**) To be confirmed whether the proposed minimum tax qualifies as QDMTT
(#) Transitional Qualified Status

	(#) Transitional Qualified Status						
Territory	IIR (*)	UTPR (*)	QDMTT / DMTT (*) (**)	Transitional Safe Harbour	Permanent Safe Harbour	Status of enactment	PwC Thought Leadership (last publication)
Albania	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Austria (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	(Potential) reporting obligation by December 31, 2024 upon appointment of Austrian Pillar Two Taxpayer
Belgium (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	New version of the draft Belgian QDMTT return released
Bosnia	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Bulgaria (#)	1 January 2024	1 January 2025	1 January 2024	Yes	No public announcement yet	Final law in force	15% global minimum tax adopted in Bulgaria as of 1 January 2024
Croatia (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	
Cyprus	31 December 2023	31 December 2024	31 December 2024	Yes	Yes	Final law in force	Cyprus votes the Global Minimum Tax of MNE Groups and Large- Scale Domestic Groups Law
Czech Republic (#)	31 December 2023	31 December 2024	31 December 2023	Yes	No public announcement yet	Final law in force	Draft law to transpose the EU global minimum tax Directive (in Czech)
Denmark (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	
Estonia	Six year extension	Six year extension	Six year extension	No public announcement yet	No public announcement yet	Six year extension	
Finland (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Pillar Two considerations of the announced reduction in Finnish corporate income tax rate
France (#)	31 December 2023	31 December 2024	31 December 2023	Yes	No public announcement yet	Final law in force	French transposition of the EU global minimum tax Directive (In french)
Germany (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	German Tax Update: Freshly served (podcast)
Gibraltar	31 December 2024	No public announcement yet	31 December 2023	No public announcement yet	No public announcement yet	Final law in force	
Greece (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Adoption of Pillar Two rules in the Greek tax legislation
Greenland	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Guernsey (#)	1 January 2025	No public announcement yet	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	Guernsey enacts Pillar Two rules
Hungary (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Upcoming deadline for the notification obligation of MNE groups subject to the global minimum tax
Iceland	1 January 2025	No public announcement yet	1 January 2025	No public announcement yet	No public announcement yet	Draft/proposed law published	
Ireland (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Irish Finance Bill 2024
Isle of Man	1 January 2025	No public announcement yet	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	
taly (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	
Jersey	1 January 2025	No public announcement yet	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	Jersey releases its draft Pillar Two legislation and Guernsey update
Kosovo	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Latvia	Six year extension	Six year extension	Six year extension	No public announcement yet	No public announcement yet	Six year extension	
Liechtenstein (#)	1 January 2024	To be confirmed	1 January 2024	Yes	Yes	Final law in force	BEPS 2.0: Liechtenstein GloBE Law
Lithuania	Six year extension	Six year extension	Six year extension	No public announcement yet	No public announcement yet	Draft/proposed law published	
Luxembourg (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Pillar Two rules and Q&A CNC 25/035 – Impact on financial statements
Malta	Six year extension	Six year extension	Six year extension	No public announcement yet	No public announcement yet	Six year extension	Malta Budget 2024
Moldova	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	

Montenegro	No public	No public	No public	No public	No public	No public announcement yet	
Montenegro	announcement yet	announcement yet	announcement yet	announcement yet	announcement yet	No public armouncement yet	
Netherlands (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Netherlands Minimum Tax Executive Decree 2024 published
North Macedonia	No public announcement yet	No public announcement yet	1 January 2024	No public announcement yet	No public announcement yet	Final law in force	Introduction of minimum global tax and its effects in North Macedonia - Pillar Two
Norway (#)	1 January 2024	1 January 2025	1 January 2024	Yes	Yes	Final law in force	The Norwegian Ministry of Finance presented a new law related to IIR and QDMTT (in Norwegian)
Poland	1 January 2025	1 January 2025	1 January 2025	Yes	Yes	Final law in force	Introduction of regulations implementing the global minimum tax in Poland
Portugal	1 January 2024	1 January 2025	1 January 2024	Yes	Yes	Final law in force	Portugal adopts the Global Minimum Tax
Romania (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Rules for the effective minimum taxation of 15% were transposed in Romania through Law no. 431/2023
Serbia	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
Slovakia (#)	Six year extension	Six year extension	1 January 2024	Yes	Yes	Final law in force	
Slovenia (#)	1 January 2024	1 January 2025	1 January 2024	Yes	No public announcement yet	Final law in force	
Spain (#)	31 December 2023	31 December 2024	31 December 2023	No public announcement yet	No public announcement yet	Final law in force	
Sweden (#)	1 January 2024	1 January 2025	1 January 2024	Yes	No public announcement yet	Final law in force	The bill with supplementary provisions is decided (in Swedish)
Switzerland (#)	1 January 2025	To be confirmed	1 January 2024	Yes	No public announcement yet	Final law in force	Flight forwards recommended
Turkey (#)	1 January 2024	1 January 2025	1 January 2024	No public announcement yet	No public announcement yet	Final law in force	Turkey publishes draft legislation on implementation of Pillar Two rules effective from 2024
Ukraine	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	
United Kingdom (#)	31 December 2023	31 December 2024	31 December 2023	Yes	No public announcement yet	Final law in force	Pillar Two: UK update (podcast)
	<u> </u>	<u> </u>			rritories with laws in force	33	
					draft / public consultation	_	
			Total to		nents but not draft law yet	-	
				Total territories with	no public announcement Six year extension	8 3	
			· · · · · · · · · · · · · · · · · · ·		Six year extension	აა	

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PwC's Pillar Two Country Tracker



Americas

(*) This chart reflects dates of entry into force (**) To be confirmed whether the proposed minimum tax qualifies as QDMTT (#) Transitional Qualified Status

Territory	IIR (*)	UTPR (*)	QDMTT / DMTT (*) (**)	Transitional Safe Harbour	Permanent Safe Harbour	Status of enactment	PwC Thought Leadership (last publication)
Antigua and Barbuda	No public announcement yet	No public announcement yet	No public announcement yet				
Argentina	No public announcement yet	No public announcement yet	No public announcement yet				
Bahamas	No public announcement yet	No public announcement yet	1 January 2024	No public announcement yet	No public announcement yet	Final law in force	Corporate Income Tax for The Bahamas
Barbados (#)	No public announcement yet	No public announcement yet	1 January 2024	Yes	Yes	Final law in force	2024/25 Budget review Barbados
Bermuda	N/A	N/A	N/A	No public announcement yet	No public announcement yet	Pillar Two plans announced	Bermuda enacts a corporate income tax, requiring businesses to begin preparing for compliance
Bolivia	No public announcement yet	No public announcement yet	No public announcement yet				
Brazil	No public announcement yet	No public announcement yet	1 January 2025	Yes	Yes	Final law in force	Brazil tax update: full inclusion to full immersion (podcast)
British Virgin Islands	No public announcement yet	No public announcement yet	No public announcement yet	(poucue)			
Canada (#)	31 December 2023	31 December 2024	31 December 2023	Yes	Yes	Final law in force	Canada's Pillar Two, DSTs, with G(AA)Ravy on top (podcast)
Cayman Islands	No public announcement yet	No public announcement yet	No public announcement yet	pododsty			
Chile	No public announcement yet	No public announcement yet	No public announcement yet				
Colombia	No public announcement yet	No public announcement yet	No public announcement yet	Colombia passes major tax reform			
Costa Rica	No public announcement yet	No public announcement yet	No public announcement yet				
Dominica	No public announcement yet	No public announcement yet	No public announcement yet				
Dominican Republic	No public announcement yet	No public announcement yet	No public announcement yet				
Ecuador	No public announcement yet	No public announcement yet	No public announcement yet				
El Salvador	No public announcement yet	No public announcement yet	No public announcement yet				
Guatemala	No public announcement yet	No public announcement yet	No public announcement yet				
Honduras	No public announcement yet	No public announcement yet	No public announcement yet				
Jamaica	No public announcement yet	No public announcement yet	Pillar Two plans announced				
Mexico	No public announcement yet	No public announcement yet	No public announcement yet	Current tax priorities in Mexico			
Nicaragua	No public announcement yet	No public announcement yet	No public announcement yet				
Panama	No public announcement yet	No public announcement yet	No public announcement yet				
Paraguay	No public announcement yet	No public announcement yet	No public announcement yet				
Peru	No public announcement yet	No public announcement yet	No public announcement yet				
Puerto Rico	No public announcement yet	No public announcement yet	Pillar Two plans announced				
Saint Kitts and Nevis	No public announcement yet	No public announcement yet	No public announcement yet				
Saint Lucia	No public announcement yet	No public announcement yet	No public announcement yet				
Saint Vincent & the Grenadines	No public announcement yet	No public announcement yet	No public announcement yet				
Trinidad and Tobago	No public announcement yet	No public announcement yet	No public announcement yet				

United States	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	Overview of House-passed H.R. 1, the "One Big Beautiful Bill Act"
Uruguay	No public announcement yet	No public announcement yet	Pillar Two plans announced				
				Total tern	itories with laws in force	4	
			To	otal territories with law in d	lraft / public consultation	0	
			Total t	erritories with announceme	ents but not draft law yet	4	
			23				

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PwC's Pillar Two Country Tracker



(*) This chart reflects dates of entry into force (**) To be confirmed whether the proposed minimum tax qualifies as QDMTT (#) Transitional Qualified Status

			,				
erritory	IIR (*)	UTPR (*)	QDMTT / DMTT (*) (**)	Transitional Safe Harbour	Permanent Safe Harbour	Status of enactment	PwC Thought Leadership (last publication)
ustralia (#)	1 January 2024	1 January 2025	1 January 2024	Yes	Yes	Final law in force	Australia's Global and Domestic Minimum Tax passed by Parliament
china	No public announcement yet	No public announcement yet	No public announcement yet	Perspectives on the tax policy landscape in China			
long Kong SAR, china	1 January 2025	To be confirmed	1 January 2025	Yes	Yes	Final law in force	Global minimum tax and Hong Kong minimum top-up tax bill passed
ndia	No public announcement yet	No public announcement yet	No public announcement yet				
ndonesia	1 January 2025	1 January 2026	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	Indonesia officially implemented the Pillar Two GloBE Rules implementation
apan (# IIR)	1 April 2024	1 April 2026	1 April 2026	Yes	No public announcement yet	Final law in force	Compliance requirements for MNEs in Japan
lalaysia	1 January 2025	No public announcement yet	1 January 2025	Yes	Yes	Final law in force	Budget 2025
lew Zealand	1 January 2025	1 January 2025	1 January 2026	Yes	Yes	Final law in force	Global minimum effective tax rate: New Zealand draft legislation released
akistan	No public announcement yet	No public announcement yet	No public announcement yet				
apua New Guinea	No public announcement yet	No public announcement yet	Pillar Two plans announced				
hilippines	No public announcement yet	No public announcement yet	No public announcement yet				
eychelles	No public announcement yet	No public announcement yet	No public announcement yet				
ingapore	1 January 2025	No public announcement yet	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	Singapore Budget 2024
outh Korea (#)	1 January 2024	1 January 2025	No public announcement yet	Yes	No public announcement yet	Final law in force	Government's Bill to Amend Presidential Decrees of Tax Laws
aiwan	No public announcement yet	No public announcement yet	Pillar Two plans announced				
hailand	1 January 2025	1 January 2025	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	Thailand's Pillar Two Legislation enacted
letnam (#)	1 January 2024	No public announcement yet	1 January 2024	No public announcement yet	No public announcement yet	Final law in force	Draft regulation released on global minimum tax in Vietnam
				Total te	rritories with laws in force	10	
			1	otal territories with law in	draft / public consultation	0	
			Total	territories with announcer	ments but not draft law vet	2	

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(*) This chart reflects dates of entry into force (**) To be confirmed whether the proposed minimum tax qualifies as QDMTT (#) Transitional Qualified Status

	(")	=					
Territory	IIR (*)	UTPR (*)	QDMTT / DMTT (*) (**)	Transitional Safe Harbour	Permanent Safe Harbour	Status of enactment	PwC Thought Leadership (last publication)
Armenia	No public	No public	No public	No public	No public	No public announcement yet	
Armema	announcement yet	announcement yet	announcement yet	announcement yet	announcement yet	No public announcement yet	
Azerbaijan	No public	No public	No public	No public	No public	No public announcement yet	
Azerbaijan	announcement yet	announcement yet	announcement yet	announcement yet	announcement yet	No public armouncement yet	
Georgia	No public	No public	No public	No public	No public	No public announcement yet	
Georgia	announcement yet	announcement yet	announcement yet	announcement yet	announcement yet	No public armouncement yet	
Kazakhstan	No public	No public	No public	No public	No public	Public consultation	
Nazakiistaii	announcement yet	announcement yet	announcement yet	announcement yet	announcement yet	Fublic Consultation	
Mongolia	No public	No public	No public	No public	No public	No public announcement yet	
Mongolia	announcement yet	announcement yet	announcement yet	announcement yet	announcement yet	No public announcement yet	
Uzbekistan	No public	No public	No public	No public	No public	No public announcement yet	
UZDEKISTAN	announcement yet	announcement yet	announcement yet	announcement yet	announcement yet	No public announcement yet	
				Total ter	ritories with laws in force	0	
			To	tal territories with law in	draft / public consultation	1	·
			Total t	erritories with announcen	nents but not draft law yet	0	
				Total territories with	no public announcement	5	

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PwC's Pillar Two Country Tracker



Middle East

(*) This chart reflects dates of entry into force (**) To be confirmed whether the proposed minimum tax qualifies as QDMTT (#) Transitional Qualified Status

Territory	IIR (*)	UTPR (*)	QDMTT / DMTT (*) (**)	Transitional Safe Harbour	Permanent Safe Harbour	Status of enactment	PwC Thought Leadership (last publication)
Bahrain	No public announcement yet	No public announcement yet	1 January 2025	Yes	Yes	Final law in force	Bahrain DMTT Regulations Released
Egypt	No public announcement yet	No public announcement yet	No public announcement yet				
Israel	No public announcement yet	No public announcement yet	1 January 2026	No public announcement yet	No public announcement yet	Pillar Two plans announced	
Jordan	No public announcement yet	No public announcement yet	No public announcement yet				
Kuwait	No public announcement yet	No public announcement yet	1 January 2025	Yes	Yes	Final law in force	Kuwait implements Pillar Two from 1 January 2025
Oman	1 January 2025	No public announcement yet	No public announcement yet	No public announcement yet	No public announcement yet	Final law in force	Oman implements Pillar Two
Qatar	No public announcement yet	No public announcement yet	1 January 2025	No public announcement yet	No public announcement yet	Final law in force	Qatar's commitment to introduce Global Minimum Tax
Saudi Arabia	No public announcement yet	No public announcement yet	No public announcement yet				
United Arab Emirates	No public announcement yet	No public announcement yet	Final law in force	UAE implements Pillar Two			
				Total te	rritories with laws in force	5	
			1	otal territories with law in	draft / public consultation	0	
			Total	territories with announce	ments but not draft law yet	1	
				Total territories wit	h no public announcement	3	

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