



# REPORT ON THE MAIN FINDINGS AND RECOMMENDATIONS OF THE DIGITAL PARTICIPATION

## [GLOBAL ANTI-BASE EROSION MODEL]

[2024]

Version [number (To be  
changes based on  
updates)]

## 1. Introduction

<b>Participation title</b>	Global Anti-Base Erosion Model
<b>Participation type</b>	[consultation / poll]
<b>Brief description</b>	The consultation is with respect to the Global Minimum Tax or Global Anti-Base Erosion Model (Pillar Two) Rules approved by the G20 and the Organization for Economic Co-operation and Development Inclusive Framework on Base Erosion and Profit Shifting and how this should be best implemented in the UAE Potential policy design options to respond to the implementation of the GloBE Rules in the UAE, in particular with the design of the UAE Domestic Minimum Top-up Tax.
<b>Participation objective</b>	This will help inform the UAE Ministry of Finance on aspects such as, domestic implementation issues, such as interactions with the UAE's corporate tax system, ways to minimise compliance costs, while exploring the policy options for potential implementation of the Income Inclusion Rule, Undertaxed Profits Rule and a Domestic Minimum Top-up Tax.
<b>Target audience</b>	All Sectors
<b>Responsible entity</b>	Ministry of Finance
<b>Start date</b>	15-03-2024
<b>End date</b>	10-04-2014
<b>Participation duration</b>	[Number of days / months]
<b>Languages used</b>	[Arabic / English]

<b>Marketing channels</b>	[Social Media / Ministry Portal]
---------------------------	----------------------------------

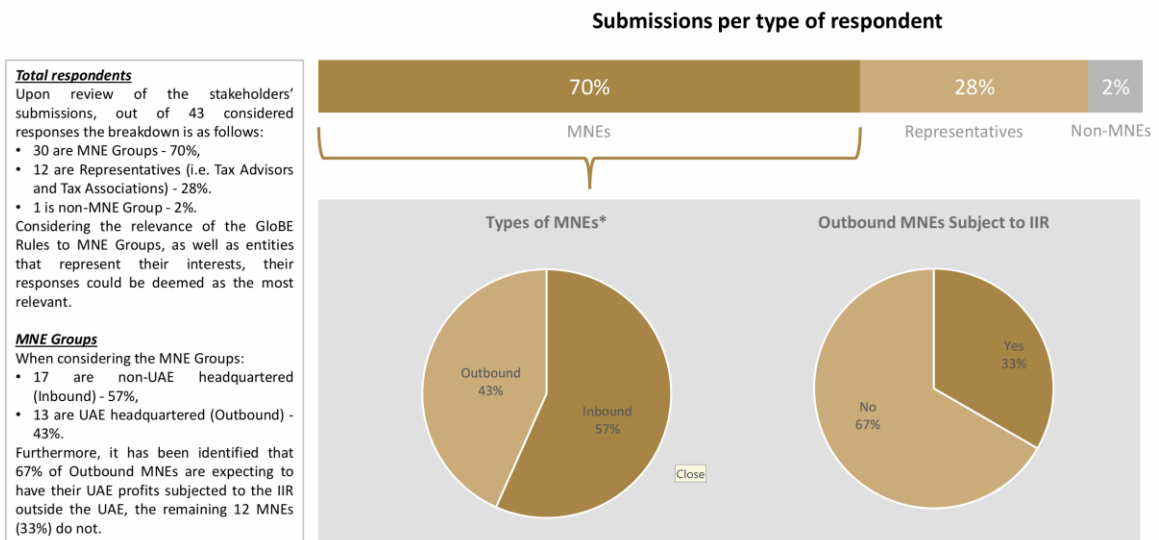
## 2. Participations Overview

<b>Number of participants</b>	43
<b>Number of comments</b>	43

### 3. Results Overview

- [Add images of results generated by msurvey - include a title or description for each image.]
- [Add summary of key conclusions drawn from the results]

#### Submissions Overview



\* One sovereign fund responded – even though it has responded as not being in scope of GloBE Rules, for the purpose of this assessment it has been considered as an MNE, since it meets the threshold condition, but is excluded as a sovereign wealth fund.

## 4. Decisions Made

- [Identify the actions or steps planned based on the consultation results.]
- [Define timelines and parties responsible for implementing the decisions]
- [Indicate how participants feedback will be incorporated into decision-making processes.]

### **Details and Goals**

This will help inform the UAE Ministry of Finance on aspects such as, domestic implementation issues, such as interactions with the UAE's corporate tax system, ways to minimise compliance costs, while exploring the policy options for potential implementation of the Income Inclusion Rule, Undertaxed Profits Rule and a Domestic Minimum Top-up Tax.

### **Decisions expected as a result of this initiative**

Based on feedback received, the UAE has already announced the introduction of a Domestic Minimum Top-up Tax, the draft legislation is finalised and will be released before 31 December 2024. The implementation of an Income Inclusion Rule is still under assessment and may be considered to be introduced in the near future. The UAE legislation is closely aligned to the GloBE Model Rules.

### **Outcome and Impact**

Based on the responses, we noted that majority of respondents (which included, multinational enterprises and advisors) were in favour of the introduction of the GloBE Rules in the UAE with positive sentiments towards the introduction of a Domestic Minimum Top-up Tax (DMTT) and the Income Inclusion Rule. Respondents also highlighted the preference and importance of the rules to be aligned with the GloBE Model Rules as issued by the OECD and the need for the DMTT to achieve 'Qualified' and 'Safe Harbour' status.

As a result, the UAE has already announced the introduction of a Domestic Minimum Top-up Tax, the draft legislation is finalised and will be released before 31 December 2024

## 5. Resources

- [Add links (video, press release, social media comments, etc.)]
- [Add pictures of brainstorming sessions, conferences, etc.]
- [Add images for participation marketing channels.]

**Michael Jansen**  
Partner | Tax and Accounting | Tax Advisor (Germany) | Steuerberater  
807 followers  
30 Posts  
View Profile + Connect

**! UAE MoF launches the Global Minimum Tax Public Consultation !**

The Ministry of Finance ("MoF") of the United Arab Emirates ("UAE") launched a public consultation on Global Minimum Tax ("GMT") / Global Anti-Base Erosion Rules ("GloBE Rules") (also known as the "Pillar Two Rules").

Source: <https://lnkd.in/d/w6xhT4c>

The Consultation is divided into:

- (i) A questionnaire (Ref: <https://lnkd.in/d-TA-h4k>) and
- (ii) A Guidance paper ([https://lnkd.in/dJ\\_SjU2Z](https://lnkd.in/dJ_SjU2Z))

The questionnaire covers two major aspects:

- (i) The implementation of Pillar Two in the UAE (capturing, the GloBE implementation, the design of the domestic top-up tax, and administrative matters) and
- (ii) substance-based incentives.

Some of the important perspectives that the MoF has sought from the business community in the questionnaire include:

- On the evaluation of the Income Inclusion Rule ("IIR"), the Under-Taxed Profits Rule ("UTPR") and the Qualified Domestic Minimum Top-up Tax ("QDMTT"), an indication of the advantages and disadvantages of UAE HQ'd MNE groups, and non-UAE HQ'd MNE groups.

Explore topics

- Sales
- Marketing
- IT Services
- Business Administration
- HR Management
- Engineering
- Soft Skills
- See All

**CA Naveen Sharma**  
Director Internal Audit at Al Shiraai Group & Past Chairman of ICAI UAE (Dubai) Chapter...  
5,358 followers  
84 Posts · 11 Articles  
View Profile + Connect

I've just shared an in-depth article discussing the UAE Ministry of Finance's recent public consultation paper on the implementation of the Pillar 2 Global Minimum Tax (GloBE) Rules. This is a significant development for multinational enterprises and anyone keen on international tax policies. I encourage you to read and share your thoughts on how these changes might impact our industry and beyond. Let's discuss!

**CA Naveen Sharma**  
Director Internal Audit at Al Shiraai Group & Past Chairman of ICAI UAE (Dubai) Chapter & ...  
8mo

In a landmark development, the UAE Ministry of Finance has recently unveiled a comprehensive public consultation paper focusing on the implementation of the Pillar 2 Global Minimum Tax (GloBE) Rules, a crucial component of the OECD's Base Erosion and Profit Shifting (BEPS) project. This initiative marks a significant stride toward curbing tax avoidance and ensuring fair taxation across borders.

#GlobalTaxReform #UAEFinance, #TaxPolicy, #OECD, #CorporateTax  
#MultinationalEnterprises, #BEPS, #EconomicDevelopment  
#InternationalBusiness, #FinanceProfessionals

More from this author

- "Critical UAE VAT Updates: Key Changes You Need to Know Before November 2024"  
CA Naveen Sharma · 2mo
- Double Taxation Avoidance Treaties: A Crucial Tool in the UAE's Evolving Tax Landscape  
CA Naveen Sharma · 6mo
- Application of Withholding Tax under the Double Taxation Agreement Kingdom of Saudi Arabia ("KSA") with Examples & 3 questions

**Pranav Bagdai**  
Tax & Compliance Lead  
9mo

The Ministry of Finance in the UAE has issued a Public Consultation on Global Minimum Tax or Pillar Two. The consultation paper outlines the UAE's preliminary framework for adopting Pillar Two regulations and invites input from stakeholders. Interested parties have until April 10, 2024, to participate in the consultation.

<https://lnkd.in/d4TU9nP7>

#pillartwo #globalminimumtax #mof

Published on LinkedIn