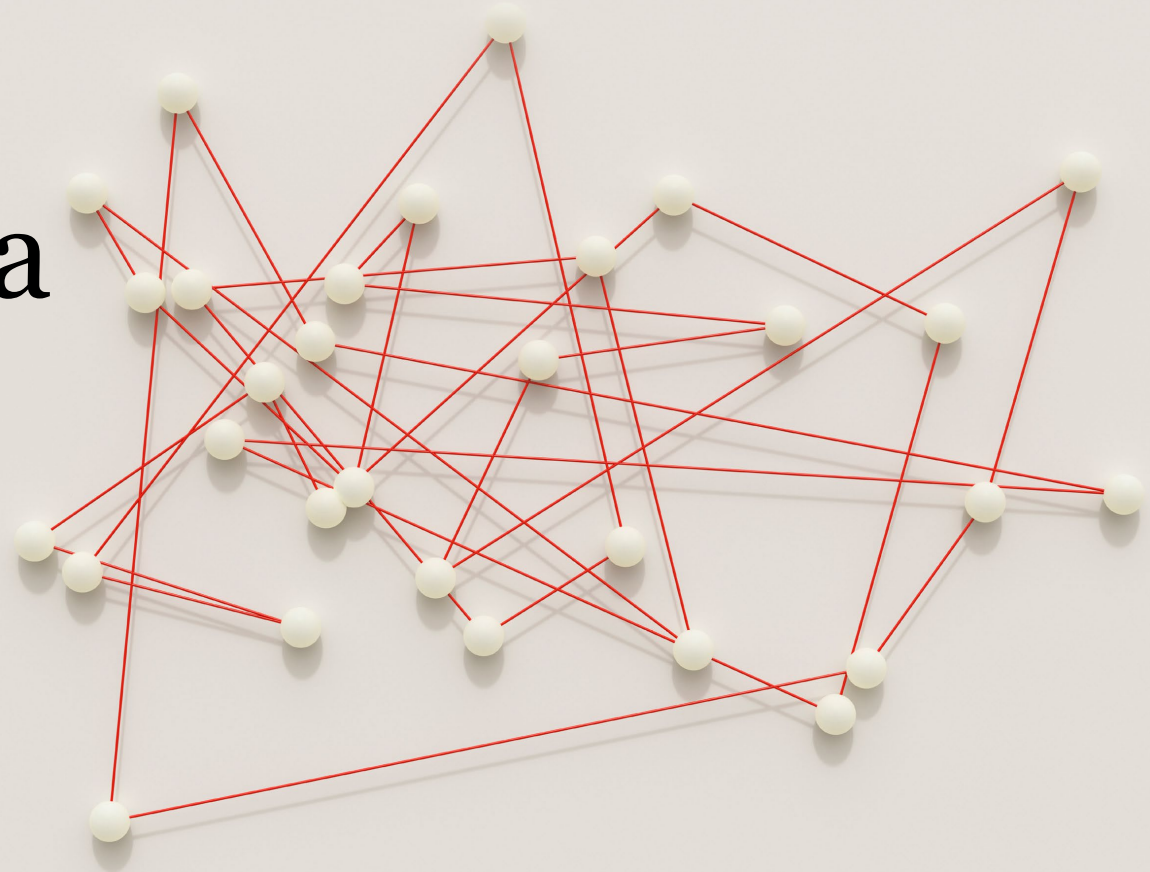# Pillar Two Data Input Catalog

March 2024

1 Executive summary

In December 2023, the OECD published its most recent set of Administrative Guidance (December Guidance) on the Global Anti-Base Erosion Model Rules (Pillar Two). Following each version of the OECD Administrative Guidance on Pillar Two, PwC has published the Data Input Catalog to help prepare Multinational Enterprise Groups (MNEs) for the anticipated implementation of such regime, with PwC's first publication in March of 2023 following the February Guidance published by the OECD. The February Guidance mainly provided guidance with respect to issues relating to scope, transition rules, and the Qualified Domestic Minimum Top-Up Tax (QDMTT).

In July 2023, the OECD published additional Administrative Guidance (July Guidance) which covered topics relating to currency conversion rules when calculating Global Anti-Base Erosion (GloBE) income, tax credits taken into account, and the Substance-based Income Exclusion (SBIE). The July Guidance also provided detail as to what constitutes a QDMTT and introduced a QDMTT Safe Harbour. The OECD also published the final version of the GLoBE Information Return (GIR) following an earlier public consultation draft, which provided transitional reporting requirements that allow MNEs to report their GloBE calculations at a jurisdictional level. PwC updated the Data Input Catalogue subsequently.

The December 2023 Guidance now provides additional rules with respect to a number of items which will help MNE Groups transition into the GloBE Rules. Specifically, the December Guidance provides additional details on the application of the Transitional Country-by-Country Reporting (CbCR) Safe Harbour as well as addresses what constitutes a qualifying CbCR and the consistent use of data in its application. Moreover, the December Guidance addresses the definition of "revenue" for purposes of scope in applying the GloBE Rules and clarifies how to allocate the controlled foreign corporation (CFC) tax incurred under a Blended CFC Tax Regime to entities located in jurisdictions location in which the GloBE Jurisdictional Effective Tax Rate (ETR) is below the applicable rate for the Blended CFC Tax Regime (using the formula set out in the July Guidance).

This latest version of the Data Input Catalog has been updated to incorporate the December Guidance and is intended to provide an overview of the challenges and complexities that MNEs will face upon the implementation of Pillar Two and be a detailed guide to the information required for determining and computing amounts under the GloBE Rules.

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 MNEs with consolidated revenue over €750m - 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 (and the accompanying Commentary published in March 2022) define the scope and key mechanics of the GloBE Rules. Since the release of the Model Rules in 2021, there have been three rounds of Administrative Guidance published, the first in February 2023, the second in July 2023, and the

34%

Pillar Two is the top focus for **34%** of companies.

Source: PwC Tax Readiness Webcast: New year, new updates… (January 2024)

third in December 2023, which helped to explain the Model 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. However, where a jurisdiction has implemented a QDMTT, the top-up tax should first be collected in that local country before applying the IIR or UTPR. The July Guidance provided a safe harbour for qualifying QDMTTs that sets the IIR or UTPR Top-up Tax to zero for a jurisdiction with a qualifying QDMTT as applied to the relevant MNE.

Further, on October 3, 2023, the G20/OECD Inclusive Framework (IF) on BEPS opened for signature by states, without reservations, a multilateral instrument (MLI) to implement the Pillar Two Subject to Tax Rule (STTR), which is a treaty-based rule intended to compliment the IIR and UTPR and adapt those rules for a treaty context. The STTR allows the source jurisdiction to "tax back" where income is covered in a defined category and subject to nominal corporate income tax rates below the STTR minimum rate and domestic taxing rights over that income have been ceded under a treaty.

In December 2022, the European Union formally adopted Pillar Two minimum taxation rules ('EU Directive'). Since then, many countries have continued to propose and enact legislation during 2023 which is expected to become law during 2024. As of March 1, 2024, 25 countries (including Japan, South Korea, and the UK) have either introduced draft legislation or adopted final legislation which implement some form of Pillar Two's Model Rules into their national laws. See PwC's Pillar Two Country Tracker for details. Additional countries intend to follow suit, though expected date of effect of any legislation is unclear. As a result of these developments, most multinationals have at least one constituent entity now subject to Pillar Two legislation and the trend is likely to continue. Throughout the last year, the OECD has released several Pillar Two guidance and consultation documents to shed light on the practical application of the GloBE Rules, as described above.

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 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 CbCR, 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. Further, the Safe Harbours and Penalty Relief document published in December of 2022 required that a Qualified CbCR be used, which is a more stringent standard than that required for CbCR today. Please refer to the blog Transfer Pricing and the Pillar Two Transitional CbCR Safe Harbor: What do you need to know to transform? for additional insights.

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, stating:

The common approach under Pillar Two contemplates that jurisdictions that wish to introduce the GloBE rules will implement and apply their domestic law rules in a consistent and coordinated 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 are reaching agreement, the OECD expects to be releasing 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.

Guidance for qualified financial statements

including **adjustments** is the most relevant piece of the December 2023 guidance, according to companies.

Source: PwC Tax Readiness Webcast: New year, new updates… (January 2024)

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, Controllership, 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.
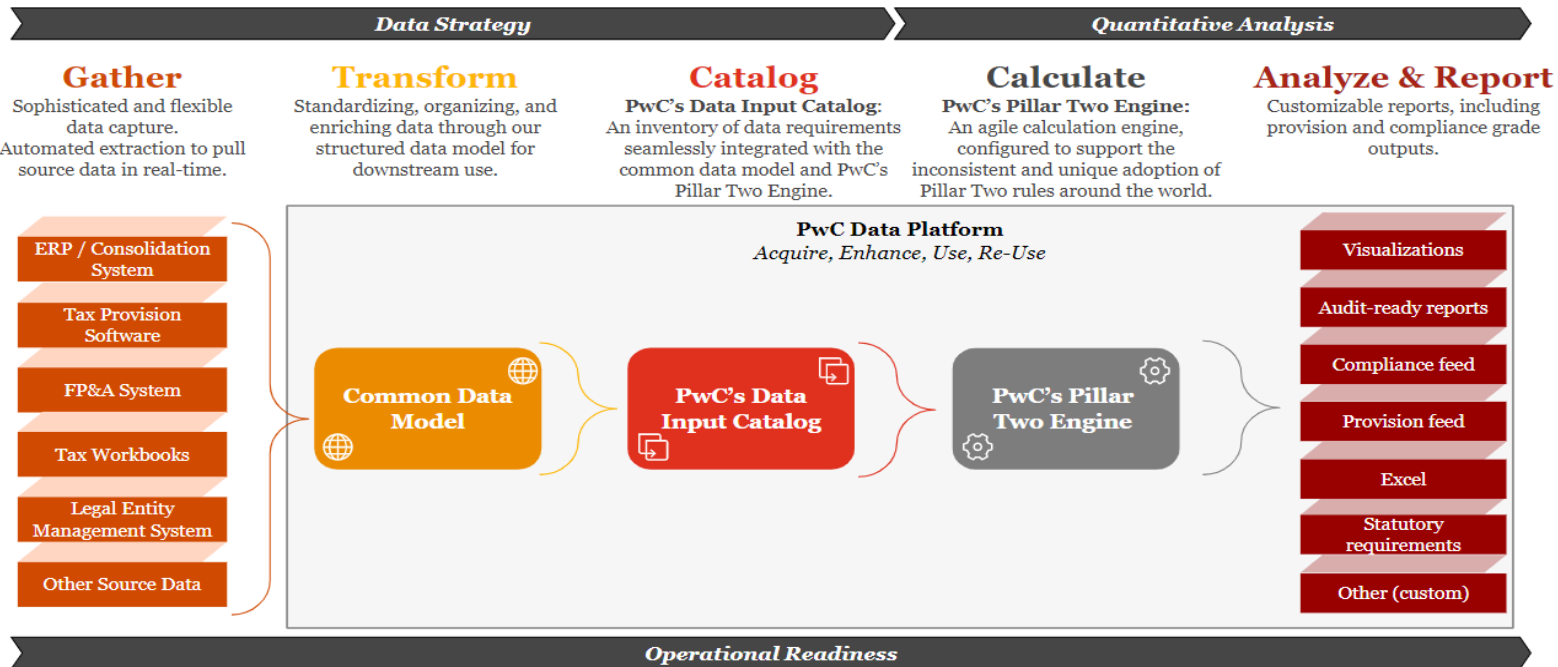
Operational readiness

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, and 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.

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.

As seen below, 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.

Data Strategy | *Quantitative Analysis*

Gather
Sophisticated and flexible data capture.
Automated extraction to pull source data in real-time.

Transform
Standardizing, organizing, and enriching data through our structured data model for downstream use.

Catalog
PwC's Data Input Catalog:
An inventory of data requirements seamlessly integrated with the common data model and PwC's Pillar Two Engine.

Calculate
PwC's Pillar Two Engine:
An agile calculation engine, configured to support the inconsistent and unique adoption of Pillar Two rules around the world.

Analyze & Report
Customizable reports, including provision and compliance grade outputs.

PwC Data Platform
Acquire, Enhance, Use, Re-Use

Source		Output
ERP / Consolidation System		Visualizations
Tax Provision Software	**Common Data Model** → **PwC's Data Input Catalog** → **PwC's Pillar Two Engine**	Audit-ready reports
FP&A System		Compliance feed
Tax Workbooks		Provision feed
Legal Entity Management System		Excel
Other Source Data		Statutory requirements
		Other (custom)

Operational Readiness

6

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 GIR. The GIR was finalized in July 2023 following the public consultation in March 2023. 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.

20%

Only 20% of companies have modeled the impact, performed safe harbour analysis, and organized data collection process for Pillar Two.

Source: PwC Tax Readiness Webcast: New year, new updates… (January 2024)

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 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.
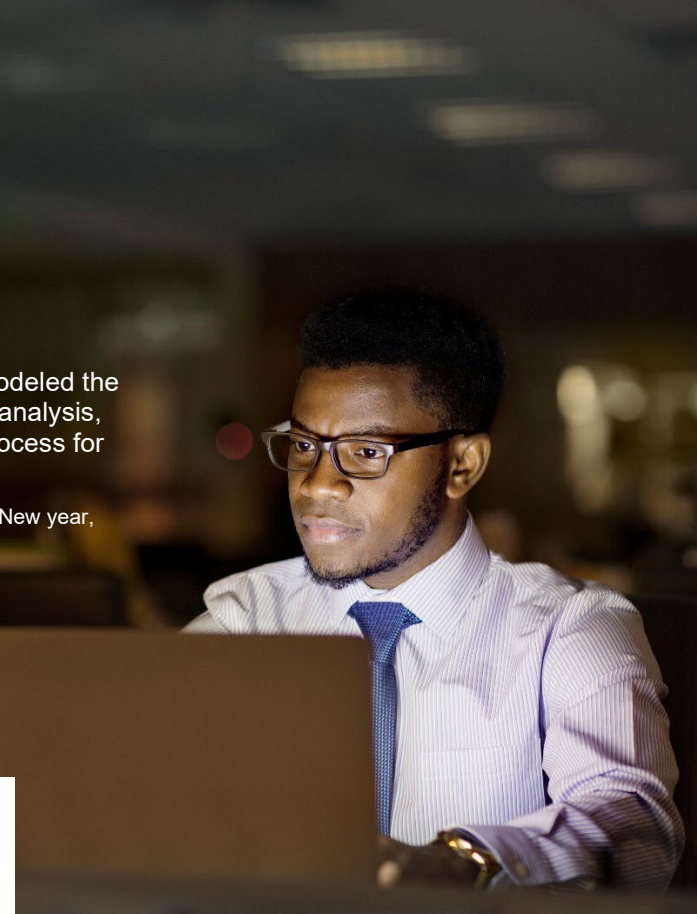
4 How PwC can help

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-evaluating 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:

- Evaluating 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.

- Standing up new processes that will be required under Pillar Two.

- Analyzing the potential benefit of making certain elections under Pillar Two.

- Modeling to understand both Pillar Two financial impact and process impact on key jurisdictions.

- Assessing whether operational or structural changes may be beneficial.

- Aligning stakeholders and determining operating model impacts.

- Providing tax policy background to contextualize the data requirements.

- Advising on the 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, reviewing disclosures.

Comply

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

- Supporting the development and configuration of modeling and compliance solutions using your existing systems or your internally developed solution.

- Utilizing PwC's Pillar Two Engine to help reduce the time and cost associated with your future reporting and compliance obligations.

- Documenting 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 increase efficiencies and insights, leveraging connected data.

5 Key contacts

Doug McHoney
International Tax Services
Global Leader
PwC US
douglas.mchoney@pwc.com
+1 314-749-7824

Will Morris
Global Tax Policy
Leader
PwC US
william.h.morris@pwc.com
+1 202-213-2372

Dom Megna
US Tax Reporting & Strategy
Leader
PwC US
dom.megna@pwc.com
+1 347-324-7118

Matthew Ryan
Tax Partner
International Tax Services
PwC UK
matthew.a.ryan@pwc.com
+44 7718-981211

Jesse Kavanagh
Tax Partner
Tax Reporting & Strategy
PwC Hong Kong
jesse.kavanagh@hk.pwc.com
+852 2289-1100

Jorgen Broothaers
Tax Partner
Tax Reporting & Strategy
PwC Belgium
jorgen.broothaers@pwc.com
+32 473-91-02-06

Jurriaan Weerman
Tax Partner
Tax Reporting & Strategy
PwC Netherlands
jurriaan.weerman@pwc.com
+31 88-792-5086

Anthony Sciarra
Tax Partner
Tax Reporting & Strategy
PwC US
anthony.sciarra@pwc.com
+1 646-599-3811

Pieter Deré
Tax Partner
International Tax Services
PwC Belgium
pieter.dere@pwc.com
+32 498-48-95-11

Steven Kohart
Tax Partner
International Tax Services
PwC US
steven.p.kohart@pwc.com
+1 203-517-6174

Philip Ramstetter
Tax Partner
International Tax Services
PwC US
philip.s.ramstetter@pwc.com
+1 513-254-6201

Erin Callanan
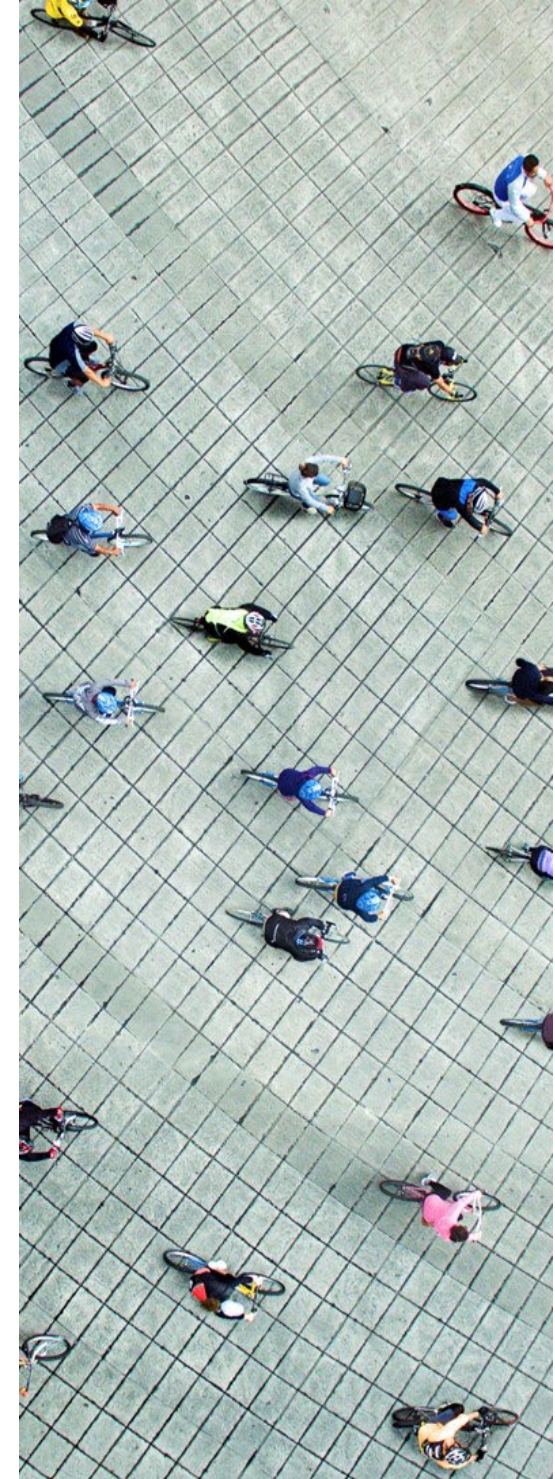Tax Partner
Tax Reporting & Strategy
PwC US
erin.callanan@pwc.com
+1 215-796-1018

Patrick Coughlin
Tax Director
Quantitative Solutions &
Technology
PwC US
patrick.coughlin@pwc.com
+1 708-218-8172

Katherine Miller
Tax Director
Tax Reporting & Strategy
PwC US
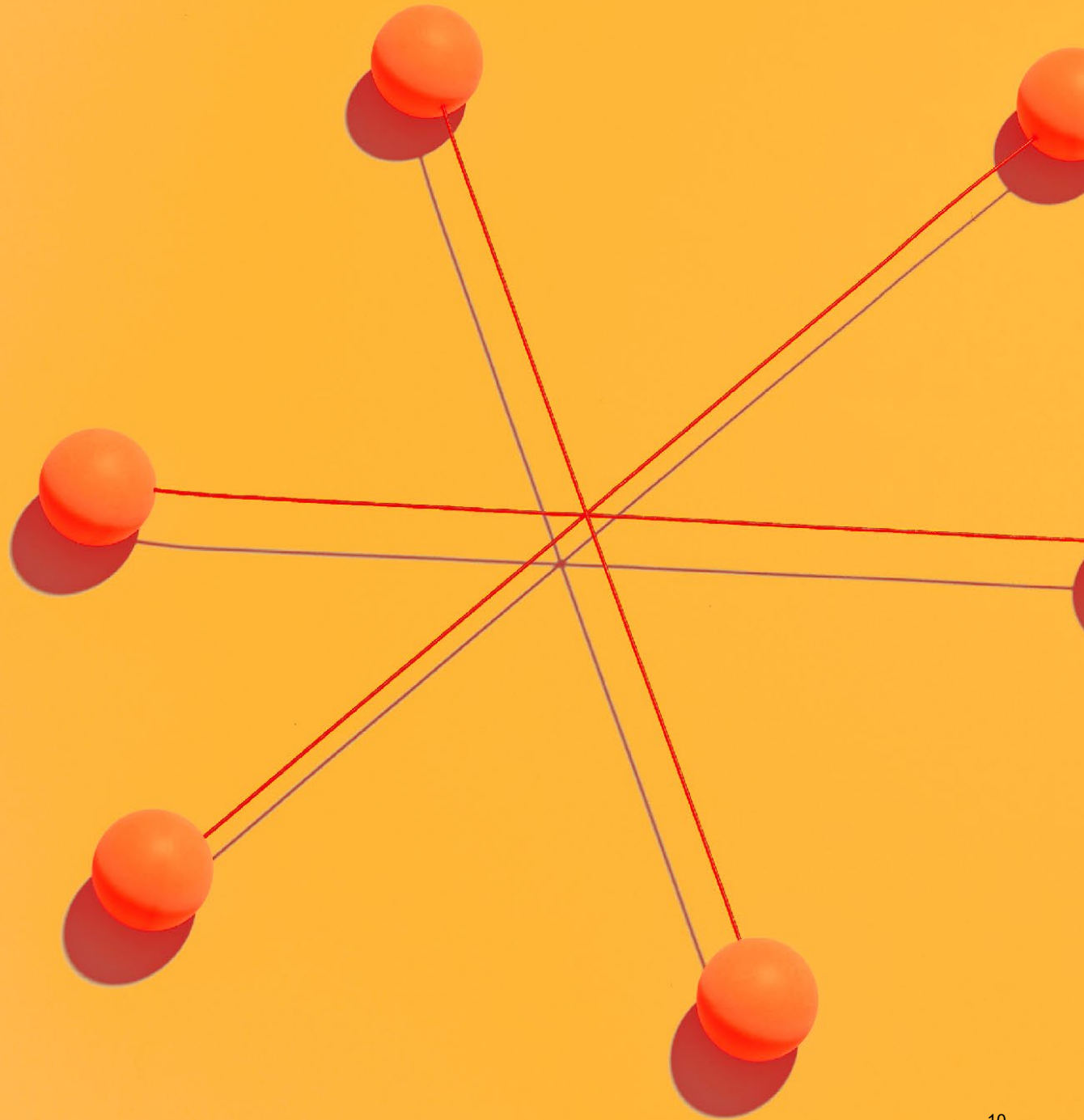katherine.miller@pwc.com
+1 203-512-6473

6 Data Input Catalog

Data Input Catalog

Appendix A
Constituent Entities

REF #	Description	Category	Typical Data Owner	References OECD Guidance	References GIR
Constituent Entities - group information					
1.001	List of Constituent Entities (including Permanent Establishments and any entities that may be excluded for GloBE purposes)	Data Point	Legal/Tax	MR 1.3	Master Data
1.002	List of Non-Material Constituent Entities (NMCE) that have elected into Simplified Calculations Safe Harbour	Election	Tax	MR 8.2.1, December 2023 AG 6.2, 2022 SH 6.1	2.2.1.2.a
1.003	List of entities held for sale or reported in discontinued operations for the fiscal year	Data Point	Legal/Tax	MR 5.3.4.47	
1.004	Direct ownership percentage of each CE held within the group by other Constituent Entities (UPE/POPE/IPE)	Data Point	Legal/Tax	MR 8.1.4(b)	1.3.3.7, 1.3.3.8
1.005	Direct ownership percentage of each CE held outside the group (3rd party or non-Constituent Entity)	Data Point	Legal/Tax	MR 8.1.4(b)	
1.006	Controlling interests (in %) of the Ultimate Parent Entity in each Constituent Entity (automated in Pillar Two Engine based on direct ownership percentages above)	Calculation	Legal/Tax	MR 8.1.4(b)	1.3.2.1.10
1.007	Consolidated Financial Statements of the UPE (type)	Informational	Finance	MR 3.1.2	1.2.2.1
1.008	Financial Accounting standard(s) used for the CFS of the UPE	Informational	Finance	MR 3.1.2	1.2.2.2, 3.3.4.1
1.009	Group reporting currency (consolidated financial statements)	Informational	Finance	July 2023 AG 1	
1.010	Designated local entity for each jurisdiction	Election	Legal/Tax	MR 8.1	
1.011	Transactions occurring after 30 November 2021, but before commencement of first Transition Year	Informational	Finance/Tax	MR 9.1.3	3.2.1.1.2.z
1.012	Transactions occurring in the current (GloBE) year	Informational	Finance/Tax	MR 9.1.3	1.3.3.a, 3.2.1.1.2.z
1.013	List of fiscal unity/tax consolidation groups within MNE group	Data Point	Legal/Tax	MR 3.2.4(b)	
1.014	List of CFC regimes within MNE group (including blended CFC regimes)	Data Point	Legal/Tax	MR 4.3.2, 10.1	
1.015	List of Main Entities that own a PE/branch/disregarded entity/flow-through	Data Point	Legal/Tax	MR 3.4, 3.5	
1.016	De Minimis Exclusion (by Jurisdiction)	Election	Tax	MR 5.5.1	2.2.2.1
1.017	Average December FX rate December previous year as quoted by ECB	Data Point	Finance/Tax	MR 4.6, 5.5.1	
1.018	Nominal statutory tax rate for UPE jurisdiction	Data Point	Tax	MR 7.1.1(a)	2.2.1.3.b.1
Constituent Entities - entity information					
1.019	Tax identification number for each Constituent Entity	Data Point	Legal/Tax	MR 8.1.4(a)	Master Data
1.020	Legal form	Data Point	Legal/Tax	MR 8.1, 10.2	Master Data
1.021	Location for each Constituent Entity	Data Point	Legal/Tax	MR 10.3	Master Data
1.022	Accounting functional currency	Data Point	Legal/Tax	MR 3.2.1(f)	1.2.2.2
1.023	Tax functional currency	Data Point	Legal/Tax	MR 3.2.1(f)	1.2.2.3
1.024	Third currency of any financial/operation transactions (if applicable)	Data Point	Legal/Tax	MR 2.34, 3.2.1(f)	

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
1.025	Status for GloBE purposes (Tax qualification for each Constituent Entity): • Incorporated entity • Permanent establishment • Hybrid • Reverse hybrid • Tax transparent entity • Qualified ownership interest (tax transparent entity) • Investment entity • Insurance investment entity • Governmental entity • International organization • Non-profit organization • Pension fund • Joint Venture • Tax Neutral UPEs (for Transitional Safe Harbor) • Non-Material Constituent Entity (for Transitional Safe Harbor) • Excluded Entities (for Transitional Safe Harbors)	Data Point	Legal/Tax	MR 10.1, 10.2, February 2023 AG 2.9 par 57.8, 2022 SH 6.1	1.3.1.6
1.026	Investment Entity Tax Transparency Election	Election	Tax	MR 7.5	3.2.4.3.3.f
1.027	Treatment of an Excluded Entity as Constituent Entity	Election	Tax	MR 1.5.3	3.2.4.3.3.c
1.028	If the entity is transferred during the current year, number of days/months the financials are included (and where) within the structure	Data Point	Legal/Tax	MR 6.2	1.3.3
1.029	Current tax rate	Data Point	Tax	MR 4.4.1	2.2.1.3.b.1
1.030	Deferred tax rate	Data Point	Tax	MR 4.4.1	
1.031	GloBE Revenue (after GloBE adjustments and after consolidation adjustments attributable to intra-group transactions) for de minimis test	Calculation	Tax	MR 1.1, 5.5.1-5.5.3, 6.1	2.2.2.1.2
1.032	Acceptable or Authorised Financial Accounting Standard (if different than UPE)	Informational	Finance	MR 3.1.3	3.2.4.6.2
1.033	Transition Year	Informational	Tax	MR 9.1, July 2023 AG 4 paragraph 45-54	2.3.1
1.034	Fiscal Year-End Date (if not Calendar Year-end)	Data Point	Finance/Tax	MR 8.1.6	1.2.1.3

Appendix B
Computation of GloBE
Income or Loss

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	GIR
Computation of GloBE Income or Loss – allocation between constituent entities					
2.001	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.	Data Point	Finance/ Controllership	MR 3.1	3.2.4.1.a
2.002	Loss incurred at permanent establishment (PE) in the current year that is deductible at Main Entity	Data Point	Finance/ Controllership	MR 3.4.5	3.2.4.1.b
2.003	Loss incurred at PE in a prior year that was deducted at Main Entity	Data Point	Finance/ Controllership	MR 3.4.5	3.2.4.1.b
2.004	Amount of GloBE Income recorded in a PE that is allocated to the ME	Data Point	Finance/ Controllership	MR 3.4.5	3.2.4.1.b
2.005	Items booked in CEs (including the UPE) that are related to and can reliably be traced to other CEs	Data Point	Finance/ Controllership	MR 3.4, 3.5	3.2.4.1.b.7
2.006	Items booked in one CE (Main Entity, group/consolidated financial accounts) but related to another CE	Data Point	Finance/ Controllership	MR 3.4, 3.5	3.2.4.1.b.6
2.007	Profit and loss adjustments related to intra-group transactions (consolidation/elimination adjustments) unless consolidation election is made	Data Point	Finance/ Controllership	MR 3.1.2	
Computation of GloBE Income or Loss – international shipping income exclusion					
2.008	International Shipping Income (ISI)	Data Point	Finance/ Controllership	MR 3.3.2	3.2.4.4.a.5
2.009	Qualified Ancillary International Shipping Income (QAISI)	Data Point	Finance/ Controllership	MR 3.3.3	3.2.4.4.a.9
2.010	Costs directly allocable to ISI	Data Point	Finance/ Controllership	MR 3.3.5	3.2.4.4.a.4
2.011	Costs directly allocable to QAISI	Data Point	Finance/ Controllership	MR 3.3.5	3.2.4.4.a.8
2.012	Costs not directly allocable - apportioned on revenue	Data Point	Finance/ Controllership	MR 3.3.5	
2.013	Location of strategic and commercial management of ships with ISI & QAISI	Data Point	Finance/ Controllership	MR 3.3.6	
Computation of GloBE Income or Loss – net taxes expense					
2.014	Covered taxes accrued as an expense (above the tax line)	Data Point	Tax	MR 4.1.2	3.2.4.2.a.3.a
2.015	Current taxes included in income tax expense	Data Point	Tax	MR 4.1.1	3.2.4.2.a.3.r
2.016	Deferred taxes included in income tax expense	Data Point	Tax	MR 4.1.1, 4.4	3.2.4.2.a.3.r
2.017	Interest related to Covered Taxes	Data Point	Tax	MR 4.2.1	
2.018	Penalties related to Covered Taxes	Data Point	Tax	MR 4.2.1	
2.019	Non-qualified domestic top-up taxes accrued as an expense	Data Point	Tax	MR 4.2.2	

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	GIR
2.020	Taxes arising pursuant to the GloBE rules (QDMTT/IIR/UTPR) that are included as an expense/income tax	Data Point	Tax	MR 4.2.2	
2.021	Disqualified refundable imputation taxes accrued as an expense	Data Point	Tax	MR 4.2.2	
Computation of GloBE Income or Loss – excluded dividends					
2.022	Excluded Dividends	Calculation	Finance/Tax	MR 3.2.1(b)	3.2.4.1.a.3.b
2.023	List of Non-Portfolio Shareholdings	Data Point	Finance/Tax	MR 3.2.1(b)	
2.024	List of Short-Term Portfolio Shareholdings	Data Point	Finance/Tax	MR 3.2.1(b)	
2.025	List of Non-Short Term Portfolio Shareholdings	Data Point	Finance/Tax	MR 3.2.1(b)	
2.026	Election - Include Portfolio Shareholdings Dividend Income	Election	Finance/Tax	February 2023 AG 3.5	3.2.4.3.3.d
Computation of GloBE Income or Loss – excluded equity gain or loss					
2.027	Gains and losses from changes in fair value of an Ownership Interest; except for a disposition of a Portfolio Shareholding	Data Point	Finance/ Controllership	MR 3.2.1(c)	3.2.1.1.2.c
2.028	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	MR 3.2.1(c)	3.2.1.1.2.c
2.029	Gains and losses from disposition of an Ownership Interest, except for a disposition of a Portfolio Shareholding	Data Point	Finance/ Controllership	MR 3.2.1(c)	3.2.1.1.2.c
2.030	Election - Equity Investment Inclusion Election	Election	Finance/ Controllership	February 2023 AG 2.9.2	3.2.3.1.a.3.e
2.031	Profit or loss from instruments that hedge risk recorded in the P&L in the case that the Foreign Exchange Hedge Election is made	Election	Finance/ Controllership	February 2023 AG 2.3.2	3.2.4.3.3.e
Computation of GloBE Income or Loss – included revaluation method gain or loss					
2.032	Included Revaluation Method Gain or Loss (changes in value of carrying value of property, plant and equipment included in OCI)	Data Point	Finance/ Controllership	MR 3.2.1(d)	3.2.4.1.a.3.d
Computation of GloBE Income or Loss – use of realisation method					
2.033	Election - Use of the realisation method in lieu of fair value or impairment accounting	Election	Finance/Tax	MR 3.2.5	3.2.3.1.a.3.g
2.034	Fair value revaluation gains or loss recorded in P&L	Data Point	Finance/ Controllership	MR 3.2.5	3.2.4.1.a.3.o
2.035	Difference in P&L depreciation between Fair Value or Impairment accounting and the Realisation Method if the Realisation Method is elected	Data Point	Finance/ Controllership	MR 3.2.5	3.2.4.1.a.3.o
2.036	Realized gain or loss upon disposition of any asset subject to the realisation method election	Data Point	Finance/ Controllership	MR 3.2.5	3.2.4.1.a.3.o
2.037	Difference between the fair value and the carrying value of assets/liabilities in the case that the Realisation Method election is revoked	Data Point	Finance/ Controllership	MR 3.2.5(c)	
2.038	Fair value revaluation gains or losses recorded in OCI in the case that the Realisation Method election is not made	Data Point	Finance/ Controllership	MR 3.2.1	

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
2.039	Adjusted depreciation on revalued assets in the case that the Realisation Method election is <u>not</u> made	Data Point	Finance/ Controllership	MR 3.2.1	
Computation of GloBE Income or Loss – gain or loss from disposition of assets and liabilities excluded under Article 6.3					
2.040	Gain or loss from disposition of assets and liabilities excluded under Article 6.3	Data Point	Finance/ Controllership	MR 3.2.1(e)	3.2.4.1.a.3.e
2.041	If acquisition/disposition is part of a GloBE Reorganisation, gain or loss and carrying value of disposing CE	Data Point	Finance/ Controllership	MR 6.3.2, 6.3.3	
2.042	If acquisition/disposition is not part of a GloBE Reorganisation, gain or loss from disposing CE and carrying value of acquiring CE	Data Point	Finance/ Controllership	MR 6.3.1	
Computation of GloBE Income or Loss – fair value election					
2.043	Election - Fair value recognition	Election	Finance/ Controllership	MR 6.3.4	3.2.4.3.3.h
Computation of GloBE Income or Loss – asymmetric foreign currency gains or losses					
2.044	Asymmetric Foreign Currency Gains or Losses	Informational	Finance/Tax	MR 3.2.1(f), 10.1	3.2.4.1.a.3.f
2.045	FX included in taxable income and caused by difference between tax and accounting functional currency	Data Point	Finance/Tax	MR 3.2.1(f), 10.1	
2.046	FX included in accounting income and caused by the difference between tax and accounting functional currency	Data Point	Finance/Tax	MR 3.2.1(f), 10.1	
2.047	FX fluctuation between a (third) foreign currency and the accounting functional currency	Data Point	Finance/Tax	MR 3.2.1(f), 10.1	
2.048	FX fluctuation between a (third) foreign currency and the tax functional currency	Data Point	Finance/Tax	MR 3.2.1(f), 10.1	
2.049	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	MR 3.2.1(f), 10.1	
Computation of GloBE Income or Loss – policy disallowed expenses					
2.050	Expenses accrued by the Constituent Entity for illegal payments, including bribes and kickbacks	Data Point	Finance/ Controllership	MR 3.2.1(g), 10.1	
2.051	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	MR 3.2.1(g), 10.1	
Computation of GloBE Income or Loss – prior period errors and changes in accounting principles					
2.052	Prior Period Errors and Changes in Accounting Principles	Informational	Finance/Tax	MR 3.2.1(h)	3.2.4.1.a.3.h, 3.2.4.1.a.3.i
2.053	All changes in the opening equity at the beginning of the Fiscal Year of a Constituent Entity attributable to an error or change that do not lead to a corresponding decrease of Covered Taxes in a previous Fiscal Year of 1M EUR or more (per jurisdiction)	Election	Finance/Tax	MR 4.6.1	3.2.3.1.a.1.b

REF #	Description	Category	Typical Data Owner	References OECD Guidance	References GIR
2.054	All changes in the opening equity at the beginning of the Fiscal Year of a Constituent Entity attributable to an error or change that lead to a corresponding decrease of Covered Taxes in a previous Fiscal Year of 1M EUR or more (per jurisdiction)	Data Point	Finance/Tax	MR 4.6.1	3.2.3.1.a.1.b
Computation of GloBE Income or Loss – accrued pension expense					
2.055	Accrued Pension Expense	Calculation	Finance/ Controllership	MR 3.2.1(i)	3.2.4.1.a.3.j
2.056	Amount of pension liability expense included in the Financial Accounting Net Income or Loss	Data Point	Finance/ Controllership	MR 3.2.1 (i),10.1.1	3.2.1.1.2.j
2.057	Amount contributed to a Pension Fund for the Fiscal Year	Data Point	Finance/ Controllership	MR 3.2.1 (i),10.1.1	3.2.1.1.2.j
2.058	Refund of pension fund surplus to the sponsor	Data Point	Finance/ Controllership	MR 3.2.1 (i),10.1.1	3.2.1.1.2.j
Computation of GloBE Income or Loss – income reallocated under Pillar One					
2.059	Income reallocated in the context of Pillar One	Data Point	Tax	N/A	N/A
Computation of GloBE Income or Loss – arm's length principle adjustments					
2.060	Transactions between Constituent Entities located in different jurisdictions	Informational	Finance/Tax	MR 3.2.3	3.2.1.1.2.m 3.2.4.1.a.3.m
2.061	Transactions between Constituent Entities located in the same jurisdiction resulting in a loss to the transferor.	Data Point	Finance/Tax	MR 3.2.3	3.2.1.1.2.m 3.2.4.1.a.3.m
2.062	Transactions between Constituent Entities and Minority-owned Constituent Entities/MOCE Group entities	Data Point	Finance/Tax	MR 3.2.3, 5.1, 5..2, 5.6	3.2.1.1.2.m 3.2.4.1.a.3.m
2.063	Transactions between Constituent Entities and JVs/JV Group entities	Data Point	Finance/Tax	MR 3.2.3, 5.1, 5..2, 6.4	3.2.1.1.2.m 3.2.4.1.a.3.m
Computation of GloBE Income or Loss – tax credits					
2.064	Qualified Refundable Tax Credits & non-qualifying tax credits	Data Point	Tax	MR 3.2.4	3.2.4.1.a.3.n
2.065	Qualified Refundable Tax Credits included in Current Tax	Data Point	Tax	MR 3.2.4	
2.066	Non-Qualified Refundable Tax Credit or non-refundable credit included in PBT	Data Point	Tax	MR 3.2.4	
2.067	Marketable Transferable Tax Credits included in Current Tax	Data Point	Tax	July 2023 AG 2	
2.068	Non-Marketable Transferable Tax Credits included in PBT	Data Point	Tax	MR 3.2.4	3.2.1.2.a.2.g
Computation of GloBE Income or Loss – low-tax entity intragroup financing arrangement					
2.069	Low-Tax Entity intragroup financing arrangement	Calculation	Tax	MR 3.2.7	3.2.4.1.a.3.q
Computation of GloBE Income or Loss – stock based compensation					
2.070	Election - Stock based compensation	Election	Finance/Tax	MR 3.2.2	3.2.3.1.a.3.f
2.071	Stock based compensation expense included in Financial Accounting Net Income or Loss	Data Point	Finance/Tax	MR 3.2.2	3.2.4.1.a.3.l

Appendix B | Computation of GloBE Income or Loss

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
2.072	Stock based compensation deducted for tax purposes	Data Point	Finance/Tax	MR 3.2.2	3.2.4.1.a.3.l
2.073	Cross-charges received from CEs that incurred the costs at grant and charges out the costs at vest in the case that the Stock Based Compensation election is made	Data Point	Finance/Tax	MR 3.2.2	
2.074	Cross-charges paid to CEs that have incurred the cost at grant in the case that the Stock Based Compensation election is not made	Data Point	Finance/Tax	MR 3.2.2	
2.075	Previously deducted stock-based compensation expense of options that have been expired without exercise	Data Point	Finance/Tax	MR 3.2.2	
Computation of GloBE Income or Loss – aggregate asset gain					
2.076	Election - Aggregate Asset Gain	Election	Finance/Tax	MR 3.2.6	3.2.3.1.a.1.a
2.077	Aggregate Asset Gain spread evenly across look-back period	Data Point	Finance/Tax	MR 3.2.6	3.2.4.1.a.3.p
Computation of GloBE Income or Loss – jurisdictional consolidation					
2.078	Election - Jurisdictional Consolidation Election/Tax Consolidation Group Adjustments	Election	Finance/Tax	MR 3.2.8	3.2.4.1.a.3.r
Computation of GloBE Income or Loss – debt release election					
2.079	Election - Debt Release Exclusion	Election	Finance/ Controllership	February 2023 AG 2.4	3.2.4.3.2.a
2.080	Debt release included in the Financial Accounting Net Income	Data Point	Finance/ Controllership	February 2023 AG 2.4.3	3.2.4.1.a.3.k
Computation of GloBE Income or Loss – insurance company specific adjustments					
2.081	Insurance company specific deductions/additions	Calculation	Finance/Tax	MR 3.2.9	3.2.1.1.2.s, 3.2.4.1.a.3.s
2.082	Amounts charged to policyholders for taxes paid by the insurance company in respect of returns to the policyholders	Data Point	Finance/Tax	MR 3.2.9	
2.083	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	MR 3.2.9	
2.084	Movement in insurance company's reserves related to Excluded Dividends	Data Point	Finance/Tax	February 2023 AG 3.4.1	
2.085	Movement in insurance company's reserves related to Excluded Equity Gain or Loss	Data Point	Finance/Tax	February 2023 AG 3.4.2	
Computation of GloBE Income or Loss – tier one capital					
2.086	Equity increase/decrease attributable to distributions paid or payable in respect of Additional Tier One Capital and Restricted Tier One Capital	Data Point	Finance/Tax	MR 3.2.10	3.2.1.1.2.t, 3.2.4.1.a.3.t
2.087	Additional Tier One Capital/Restricted Tier One Capital distributions paid or payable	Data Point	Finance/Tax	MR 3.2.10	3.2.1.1.2.t, 3.2.4.1.a.3.t
2.088	Amounts recognized as an increase to the equity	Data Point	Finance/Tax	MR 3.2.10, 5.5.3	3.2.1.1.2.t, 3.2.4.1.a.3.t
2.089	Amounts recognized as an expense	Data Point	Finance/Tax	MR 3.2.10, 5.5.3	3.2.1.1.2.t, 3.2.4.1.a.3.t

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
2.090	**PLACEHOLDER -** Conversion or write-off in the books of the Issuer/Subscriber	Data Point	Finance/Tax	MR 3.2.10	
Computation of GloBE Income or Loss – distributions					
2.091	Flow-through Entity reduction (UPE)	Data Point	Tax	MR 7.1.1	3.2.4.1.a.3.v
2.092	Deductible Dividend Regime reduction (UPE)	Data Point	Tax	MR 7.2.1	3.2.4.1.a.3.w
2.093	Deemed Distribution Tax Election for Eligible Distribution Tax Systems	Election	Tax	MR 7.3	3.2.3.2.1
2.094	Election - Taxable Distribution Method Election	Election	Tax	MR 7.6	3.2.4.3.3.g, 3.2.1.1.2.x
2.095	Actual and deemed distributions made to the CE owner of an Investment Entity in the case that the Investment Entity Taxable Distribution Method Election is made	Data Point	Tax	MR 7.6.1, AG 3.8.1	3.2.4.3.3.g, 3.2.1.1.2.x
2.096	Creditable tax paid by the CE owner on its share of the income distributed by the Investment Entity in the case that the Investment Entity Taxable Distribution Method Election is made	Data Point	Tax	MR 7.6	3.2.4.3.3.g, 3.2.1.1.2.x
2.097	Election - Distributions made by the Investment Entity in the case that the Investment Entity Taxable Distribution Method Election is made	Data Point	Tax	MR 7.6	3.2.4.3.3.g, 3.2.1.1.2.x

Appendix C
Computation of Adjusted
Covered Taxes

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
Computation of Adjusted Covered Taxes – current tax expense					
3.001	Current tax expense accrued in Financial Accounting Net Income or Loss with respect to Covered Taxes for the Fiscal Year SUBJECT TO THE ALLOCATION RULES APPLIED TO QUALIFYING INCOME OF PEs, HYBRIDS, REVERSE HYBRIDS, TRANSPARENT ENTITIES AND WITH RESPECT TO SHIPPING INCOME	Calculation	Tax	MR 4.1, 4.3	3.2.4.2.b.2
Computation of Adjusted Covered Taxes – CFC regimes					
3.002	Tax imposed under a CFC regime on the CE - exclude from paying entity	Calculation	Tax	MR 4.3.2(c)	
3.003	Tax imposed under a CFC regime on the CE - include on the CE that triggered the top-up tax	Data Point	Tax	MR 4.3.2	3.2.1.2.c.3
3.004	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	MR 4.3.3	
3.005	Covered Taxes included under the CFC Tax Regime of a Constituent Entity-owner in respect of Passive Income	Data Point	Tax	MR 4.3.3	
3.006	GILTI Inclusion (including Sec. 78 Gross-up)	Data Point	Tax	MR 4.3.2	
3.007	Sec. 250 Deduction related to GILTI Inclusion	Data Point	Tax	MR 4.3.2	
3.008	FTCs utilized in GILTI basket	Data Point	Tax	MR 4.3.2	
3.009	Tested Income of each Constituent Entity included in GILTI calculation	Data Point	Tax	MR 4.3.2	
Computation of Adjusted Covered Taxes – allocation of taxes					
3.010	Passive Income that is includible under the fiscal transparency rule in the financial accounts of a direct or indirect Constituent Entity-owner of a Hybrid entity	Data Point	Tax	MR 4.3.3	
3.011	Covered Taxes allocated to a Hybrid Entity by a Constituent Entity-owner in respect of Passive Income	Data Point	Tax	MR 4.3.2(d), 4.3.3	
3.012	Covered taxes arising from Main Entity which owns the PE associated with GloBE income pursuant to Article 3.4.5	Data Point	Tax	MR 4.3.2(a), 4.3.4 & 3.4.5	
Computation of Adjusted Covered Taxes – distributions					
3.013	Withholding Tax on distributed profits (transfer from recipient to payor/distributing entity)	Data Point	Tax	MR 4.2.1(a)	
3.014	Tax paid by recipient on income that is exempt under GloBE rules	Data Point	Tax	MR 4.2.1(a)	
3.015	Election - Deemed Distribution Tax Election for Eligible Distribution Tax Systems	Election	Tax	MR 7.3.1	3.2.3.2.1
3.016	Taxes on distributed profits, deemed profit distributions, and non-business expenses imposed under an Eligible Distribution Tax System	Data Point	Tax	MR 4.2.1(b), 7.3, AF February 2023 AG 3.1	3.2.3.2.1.a.2
3.017	Deemed Distribution Tax Recapture Account for each Fiscal Year	Data Point	Tax	MR 7.3.3, February 2023 AG 3.1	3.2.3.2.1.a.4

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
3.018	Distribution Tax that was paid in the Fiscal Year on actual and deemed distributions	Data Point	Tax	MR 7.3.3, February 2023 AG 3.1	3.2.3.2.1.a.3
3.019	Reduction to the Recapture Account Loss Carry-forward based on the Disposition Recapture Ration under Article 7.3.4	Data Point	Tax	MR 7.3.3, 7.3.4, February 2023 AG 3.3	3.2.3.2.1.a
3.020	GloBE loss in the jurisdiction	Data Point	Tax	MR 7.3.3, February 2023 AG 3.2	3.3.3.2.2
3.021	Tax imposed in lieu of corporate income tax, including Withholding Tax on interest and royalties (to the extent not included above)	Data Point	Tax	MR 4.2.1(c)	
3.022	Disqualified Refundable imputation tax	Data Point	Tax	MR 4.2.2(d)	
Computation of Adjusted Covered Taxes – excluded equity gain or loss					
3.023	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 (other than tax effect of the Revaluation Method for PPE)	Data Point	Tax	MR 4.1.1	3.2.4.2.a.3.r
Computation of Adjusted Covered Taxes – use of realisation method					
3.024	Tax effect for the use of the Revaluation Method (if realisation method is elected)	Data Point	Tax	MR 3.2.5	
3.025	Tax booked in P&L due to realisation (if realisation method is elected)	Data Point	Tax	MR 3.2.5	
3.026	Taxes paid upon realisation of gains (if realisation method is elected)	Data Point	Tax	MR 3.2.5	
3.027	Taxes booked in P&L because of lower depreciation (if realisation method is elected)	Data Point	Tax	MR 3.2.5	
Computation of Adjusted Covered Taxes – excluded equity method gain or loss					
3.028	Taxes on hedging gains/losses related to excluded equity investments in the case that the Foreign Exchange Hedge on Excluded Equity Gain or Loss election is made	Election	Finance/Tax	February 2023 AG 2.3.2	
Computation of Adjusted Covered Taxes – above the line taxes					
3.029	Covered tax accrued as expense	Data Point	Tax	MR 4.1.2(a)	3.2.4.2.a.3.a
Computation of Adjusted Covered Taxes – uncertain tax positions					
3.030	Amount of tax expense related to Uncertain Tax Positions	Calculation	Tax	MR 4.1.3(d)	3.2.4.2.a.3.i
3.031	Amount of UTP previously excluded and paid in the current year (excluding interest & penalties)	Data Point	Tax	MR 4.1.2(c)	3.2.4.2.a.3.c
3.032	Amount of interest and penalties included in the UTP payment above	Data Point	Tax	MR4.1.2(c)	3.2.4.2.a.3.c
Computation of Adjusted Covered Taxes – other taxes					
3.033	Taxes or surcharges on specific activities such as banking or exploration of oil and gas	Data Point	Tax	MR 4.2.1	

Appendix C | Computation of Adjusted Covered Taxes

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	GIR
Computation of Adjusted Covered Taxes – tax credits					
3.034	Amount of Qualified Refundable Tax Credit accrued as a reduction of tax expense	Data Point	Tax	MR 4.1.2(d)	3.2.4.2.a.3.d
3.035	Amount of Marketable Transferable Tax Credit accrued as a reduction of tax expense	Data Point	Tax	MR 4.1.2(d)	3.2.4.2.a.3.d
3.036	Non-Qualified Refundable Tax Credit not treated as a reduction to current tax expense	Data Point	Tax	MR 4.1.3(b)	3.2.4.2.a.3.g
3.037	Any portion of Marketable Transferable Tax Credit treated as income that does not meet the legal transferability and marketability standards	Calculation	Tax	MR 4.1.2(d)	3.2.4.2.a.3.d
3.038	Tax credit or refund of Covered Tax, except for any QRTC or MTTC, that wasn't treated as a reduction of tax expense	Data Point	Tax	MR 4.1.3(c) 4.1.3(a)	3.2.4.2.a.3.h
Computation of Adjusted Covered Taxes – other taxes					
3.039	Covered Taxes refunded or credited, except for any Qualified Refundable Tax Credit, to a Constituent Entity that was not treated as an adjustment to current tax expense in the financial accounts	Data Point	Tax	MR 4.1.3(c)	3.2.1.2.a.2.h, 3.2.4.2.a.3.h
Computation of Adjusted Covered Taxes – income or loss under Chapter 3					
3.040	Tax related to excluded income or loss under Chapter 3 - other than taxes on distribution paid by paying or receiving entity.	Data Point	Tax	MR 4.1.3(a) paragraph 8	3.2.4.2.a.3.f
Computation of Adjusted Covered Taxes – international shipping income exclusion					
3.041	Covered Taxes on certain international shipping income	Data Point	Tax	MR 4.1.3(a) paragraph 9	3.2.4.4.a.12
Computation of Adjusted Covered Taxes – distributions					
3.042	Tax on dividends that are received from a significant minority (e.g. 25%) investment in a corporation/partnership (e.g., CIT on portfolio shareholdings - not dividends withholding tax)	Data Point	Tax	MR 4.1.3(a)	
Computation of Adjusted Covered Taxes – current tax expense					
3.043	Amount of current tax expense accrued (not expected) to be paid within 3yrs	Data Point	Tax	MR 4.1.3(e)	3.2.4.2.a.3.j
3.044	All current tax accrual amounts included in Covered Taxes in year T-3 that have not been paid by the end of the current Fiscal Year	Data Point	Tax	MR 4.1.3(e)	
3.045	All current tax accrual amounts included in Covered Taxes that have not been paid within three years in excess of 1M EUR per year per jurisdiction	Calculation	Tax	MR 4.6.1	
3.046	Current tax expense related to qualifying debt release (if elected)	Data Point	Tax	February 2023 AG 2.4	
3.047	Covered taxes related to Aggregate Asset Gain (if elected in current year)	Data Point	Tax	MR 3.2.6(a)	3.2.4.2.a.3.l
Computation of Adjusted Covered Taxes – covered taxes					
3.048	Interest related to Covered Taxes	Data Point	Tax	MR 4.1.2	
3.049	Penalties related to taxes	Data Point	Tax	MR 4.1.2	

Appendix C | Computation of Adjusted Covered Taxes

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	GIR
Computation of Adjusted Covered Taxes – insurance company adjustments					
3.050	Taxes paid by an insurance company with respect to returns to policyholders	Data Point	Tax	MR 4.2.2(e)	3.2.4.1.a.3.s
Computation of Adjusted Covered Taxes – Pillar Two taxes					
3.051	IIR Top-up Tax included in income tax expense of parent CE	Data Point	Tax	MR 4.2.2(a)	3.4.1.3.1.c
3.052	Qualified Domestic Top-up tax included in income tax expense	Data Point	Tax	MR 4.2.2(b)	3.3.1.e
3.053	UTPR taxes included in income tax expense	Data Point	Tax	MR 4.2.2(c)	3.3.4.2
Computation of Adjusted Covered Taxes – qualified flow-through tax benefits					
3.054	Qualified Flow-through Tax Benefits of Qualified Ownership Interests (QOI)	Informational	Tax	February 2023 AG 2.92	3.2.1.2.a.2.e, 3.2.4.2.a.3.e
3.055	Election - Amortization Method for Qualified Ownership Interest	Election	Tax	February 2023 AG 2.92 AG June 23; 2.45	
3.056	Amount of tax credits that have flowed through to the owner from the Qualified Ownership Interest	Data Point	Tax	February 2023 AG 2.92, June 2023 AG 2.45	3.2.3.1.b.4
3.057	Amount of tax-deductible losses that have flowed through to the owner from the Qualified Ownership Interest multiplied by the statutory rate applicable to the owner	Data Point	Tax	February 2023 AG 2.92	3.2.3.1.b.4
3.058	Distributions to the owner from the Qualified Ownership Interest	Data Point	Tax	February 2023 AG 2.92	3.2.3.1.b.4
3.059	Proceeds from sale for all or part of a Qualified Ownership Interest	Data Point	Tax	February 2023 AG 2.92	3.2.3.1.b.4
3.060	Current year increases from Qualified Ownership Interest	Data Point	Tax	MR 4.6.1	3.2.3.1.b.3
Computation of Adjusted Covered Taxes – post filing adjustments					
3.061	Post-filing adjustments (i.e. adjusted after the return with respect to that year was filed)	Data Point	Tax	MR 4.6	3.2.1.2.a.2.k, 3.2.4.2.a.3.k
3.062	Post filing adjustments - increase in tax liabilities in current FY	Data Point	Tax	MR 4.6.1	3.2.1.2.a.2.k, 3.2.4.2.a.3.k
3.063	Post filing adjustments - increase in tax liabilities in prior years	Data Point	Tax	MR 4.6.1	3.2.1.2.a.2.k, 3.2.4.2.a.3.k
3.064	Post filing adjustments - decrease in tax liabilities that are greater than 1M EUR per jurisdiction per year (material decreases)	Data Point	Tax	MR 4.6.1	3.2.1.2.a.2.k, 3.2.4.2.a.3.k
3.065	Post filing adjustments - decrease in tax liabilities that are less than 1M EUR per jurisdiction per year (immaterial decreases)	Election	Tax	MR 4.6.1	3.2.1.2.a.2.k, 3.2.4.2.a.3.k
Computation of Adjusted Covered Taxes – deferred tax adjustments					
3.066	Deferred tax expense accrued in the CE's financial accounts	Data Point	Tax	MR 4.4.1	3.2.4.2.c.2
3.067	Deferred tax booked in a different (consolidation) entity that has to be allocated to the CE	Data Point	Tax	MR 4.4.1	3.2.4.1.b
3.068	Deferred tax on items excluded from the computation of GloBE Income or Loss (Chapter 3)	Calculation	Tax	MR 4.4.1(a) paragraph 3	3.2.4.2.c.3.a
3.069	DTA on stock-based compensation booked at vest with respect to jurisdictions that have elected to use the tax deduction	Data Point	Tax	MR 3.2.2	

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
3.070	Deferred tax movement related to pension expense accruals	Data Point	Tax	MR 3.2.1 (i)	
3.071	DTA related to equity gain or loss subject to the Equity Investment Inclusion Election (if not booked in OCI)	Data Point	Tax	MR 4.1.3 (a)	3.2.4.2.c.3.a
3.072	Deferred tax related to a GloBE loss of a permanent establishment	Data Point	Tax	MR 4.3.4	3.2.4.2.b
3.073	Deferred tax related to Eligible Distribution Tax Regime	Data Point	Tax	MR 7.3, 4.3	3.2.4.2.c.3
3.074	Deferred tax impact of Qualified Flow-through Tax Benefits for Qualified Ownership Interests (QOI)	Data Point	Tax	February 2023 AG 2.92	3.2.4.2.c.3
3.075	Deferred taxes in the (Insurance) Investment Entity related to Undistributed Earnings	Data Point	Tax	MR 7.5.1	3.2.4.2.c.3
3.076	Deferred tax expense which relates to uncertain tax positions	Calculation	Finance/Tax/ FP&A	MR 4.4.1(b)	3.2.4.2.c.3.d
3.077	Deferred tax expense which relates to distributions from a Constituent Entity	Calculation	Finance/Tax/ FP&A	MR 4.4.1(b)	3.2.4.2.c.3.b, 3.2.2.1.b.1.b
3.078	Election - Unclaimed Accrual Election (relates to DTL)	Election	Tax	MR 4.4.2, 4.4.7	3.2.4.3.2.b
3.079	Deferred tax expense with respect to unclaimed accruals	Data Point	Tax	MR 4.4.7	3.2.4.2.c.3.c, 3.2.2.1.b.1.c
3.080	Amount of Recaptured Deferred Tax Liability determined in a preceding FY which has been paid during the FY	Data Point	Tax	MR 4.4.2(b)	3.2.4.2.c.3.i, 3.2.2.1.b.1.i
3.081	Amount of any Disallowed Accrual or Unclaimed Accrual paid during the current FY	Data Point	Tax	MR 4.4.2(a)	3.2.4.2.c.3.h, 3.2.2.1.b.1.h
3.082	Valuation allowance/derecognition on DTA accrual/DTA attributable to current year losses recognized in Deferred Tax (release or accrual)	Data Point	Tax	MR 4.4.1(c)	3.2.4.2.c.3.d
3.083	Re-measurement of Deferred Tax with respect to a change in the applicable domestic tax rate	Calculation	Tax	MR 4.4.1(d)	3.2.4.2.c.3.e
3.084	If the domestic tax rate is reduced, and results in the application of a rate below the Minimum Rate and the reduction to the DTL is in excess of 1M EUR per year, the amount of remeasurement has to be eliminated from the year it was accrued.	Calculation	Tax	MR 4.6.2	3.2.4.2.c.3.k
3.085	If the domestic tax rate is reduced, and results in the application of a rate below the Minimum Rate and the reduction to the DTL is less than 1M EUR per year, the amount of remeasurement can be included in the current year upon election.	Election	Tax	MR 4.6.2	3.2.3.1.a.1.b
3.086	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	MR 4.6.3	3.2.4.2.c.3.l
3.087	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	MR 4.6.3	3.2.4.2.c.3.l

Appendix C | Computation of Adjusted Covered Taxes

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
3.088	Generation and use of tax credits as well as related deferred tax expense, except for tax credits on the opening balance sheet of the Transition Year (the first year Pillar Two applies to a jurisdiction)	Data Point	Tax	MR 4.4.1(e)	3.2.4.2.c.3.f
3.089	Use of tax credits on the Pillar Two deferred tax opening balance sheet of the Transition Year	Data Point	Tax	MR 4.4.1(e)	3.2.4.2.c.3.f
3.090	DTA related to domestic loss creating FTC carry forward in a CFC regime (Substitute Loss Carry Forward)	Calculation	Tax	MR 4.4.1(e), February 2023 AG 2.8	3.2.4.2.c.3.g
3.091	Deferred Tax movement related to qualifying debt release (if elected)	Calculation	Finance/Tax/ FP&A	February 2023 AG 2.4	3.2.4.3.2.a
3.092	Loss Carry Back: the release of a deemed DTA in case a current year loss can be carried back to prior years.	Calculation	Tax	MR 4.4.2(c)	3.2.2.1.c
3.093	Current year losses with no corresponding DTA recognized	Data Point	Tax	MR 4.4.2(c)	3.2.4.2.c.3.j
3.094	Deferred taxes related to Aggregate Asset Gain (if elected in current year)	Data Point	Tax	MR 3.2.6(a)	3.2.4.2.a.3.l
3.095	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	MR 4.4.1	
3.096	Release or expiration of DTA (not included in 'regular' Deferred Tax)	Data Point	Tax	MR 4.4.1(c)	3.2.4.2.c.3.d
3.097	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 (Recapture Exception Accrual). The P2 ETR and the TPT for that year must be recomputed if initially included.	Calculation	Tax/FP&A	MR 4.4.4	3.2.2.2
Computation of Adjusted Covered Taxes – GloBE loss election					
3.098	Election - GloBE Loss Election (if the special election applies, the Total Deferred Tax Adjustment amount does not apply)	Election	Tax	MR 4.5.1, 4.1.2(b)	3.2.3.1.a.6.i, 3.2.3.1.a.7.i
3.099	Total Deferred Tax Adjustment Amount under Article 4.4	Data Point	Finance/Tax	MR 4.5.2	3.2.4.2.c.4
3.100	Amount of GloBE DTA accrued (current year GloBE Loss multiplied by 15%)	Data Point	Tax	MR 4.5.3	3.2.4.2.a.3.b
3.101	Amount of GloBE DTA utilized (addition to Adjusted Covered Taxes)	Data Point	Tax	MR 4.5.3, 4.1.2(b)	3.2.4.2.a.3.b
Computation of Adjusted Covered Taxes – excess negative tax expense election					
3.102	Election - Excess Negative Tax Election (GloBE loss jurisdictions only)	Election	Tax	Feb 2023 AG 2.7	3.2.3.1.a.1.d
3.103	Excess negative Adjusted Covered Taxes in the CY in the case that the Excess Negative Tax election is made	Data Point	Tax	Feb 2023 AG 2.7	3.2.1.2.b.2
3.104	Excess Negative Tax Carryforwards from prior year	Data Point	Tax	Feb 2023 AG 2.7	3.2.1.2.b.1

Appendix D
Share & Asset Transactions

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
4.001	Transaction Date	Data Point	Legal	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.002	Legal Form of Transaction	Data Point	Legal	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.003	Purchase Accounting	Data Point	Finance	MR 3.1.2, 6.2-6.3, 9.1	3.2.1.1.2.z
4.004	Taxation at Seller	Data Point	Tax	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.005	Buyer Tax Basis	Data Point	Tax	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.006	Deferred Accounting	Data Point	Finance	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.007	Transaction Date	Data Point	Legal	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.008	Legal Form of Transaction	Data Point	Legal	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.009	Purchase Accounting	Data Point	Finance	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.010	Taxation at Seller	Data Point	Tax	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.011	Buyer Tax Basis	Data Point	Tax	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.012	Accounting Standard used for Asset Transfer	Data Point	Finance	MR 6.2-6.3, 9.1	3.2.1.1.2.z
4.013	Deferred Accounting	Data Point	Finance	MR 6.2-6.3, 9.1	3.2.1.1.2.z

Appendix E
Substance-based
Income Exclusion

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
Substance-based Income Exclusion					
5.001	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.	Calculation	Finance/HR	MR 5.3.1, July 2023 AG 3.1.1	3.3.2
5.002	Election - Election Not to Apply Substance-Based Income Exclusion	Election	Tax	MR 5.3.1, July 2023 AG 3.1.1	3.2.3.1.a.1.c
Substance-based Income Exclusion – payroll					
5.003	Eligible employees (including contractors)	Data Point	Finance/HR	MR 5.3.3	3.3.2.1.1
5.004	Eligible payroll costs (total remuneration including SBC and employer-paid social security and pension)	Data Point	Finance/HR	MR 5.3.3	3.3.2.1.1
5.005	Eligible payroll costs capitalised and included in the eligible tangible asset carve-out base	Data Point	Finance/HR	MR 5.3.3(a)	3.3.2.1.1
5.006	Eligible payroll costs attributable to income that is excluded in accordance with Article 3 (e.g., shipping)	Data Point	Finance/HR	MR 5.3.3(b)	3.2.4.4.a.10
Substance-based Income Exclusion – tangible assets					
5.007	Eligible tangible assets - property, plant and equipment	Data Point	Finance	MR 5.3.4(a)	3.3.2.1.3
5.008	Eligible tangible assets - property, plant and equipment: the carrying value of property, including land and buildings, that is held for sale, for lease (see more info) or for investment - after taking into account elimination entries in consolidation	Data Point	Finance	MR 5.3.4	3.3.2.1.3
5.009	Eligible tangible assets - property, plant and equipment: the carrying value of tangible assets used to derive income that is excluded in accordance with Article 3	Data Point	Finance	MR 5.3.4	3.2.4.4.a.11
5.010	Eligible tangible assets - natural resources	Data Point	Finance	MR 5.3.4(b)	3.3.2.1.3
5.011	Eligible tangible assets - lessee's right of use of tangible assets (after taking into account elimination entries in consolidation)	Data Point	Finance	MR 5.3.4(c)	3.3.2.1.3
5.012	Eligible tangible assets - subject to revaluation method (as for example IAS 16)	Data Point	Finance	MR 5.3.5	3.3.2.1.3
5.013	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	MR 5.3.4(d)	3.3.2.1.3
5.014	Eligible tangible assets - acquired from another entity within the MNE group	Data Point	Finance	MR 5.3.4	3.3.2.1.3
5.015	Eligible tangible assets - acquired from a 3rd party	Data Point	Finance	MR 5.3.4	3.3.2.1.3

Appendix F
UTPR Allocation Factors
(if UTPR is applicable)

Appendix F | UTPR Allocation Factors (if UTPR is applicable)

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
UTPR Allocation Factors – employees					
6.001	Number of employees of all Constituent Entities per jurisdiction that has implemented UTPR, including Permanent Establishments in jurisdiction	Data Point	Legal/HR	MR 2.6.2(a)	2.2.1.3.b
6.002	Number of employees employed by investment entities in jurisdiction	Data Point	Legal/HR	MR 2.6.2(a)	2.2.1.3.b
UTPR Allocation Factors – tangible assets					
6.003	NBV of tangible assets of all Constituent Entities per jurisdiction that has implemented UTPR, including Permanent Establishments in that jurisdiction	Data Point	Finance	MR 2.6.2(a)	2.2.1.3.b
6.004	NBV of tangible assets owned by investment entities in jurisdiction	Data Point	Finance	MR 2.6.2(a)	2.2.1.3.b

Appendix G
Transitional
Safe Harbours

REF #	Description	Category	Typical Data Owner	References	
				OECD Guidance	**GIR**
Transitional Safe Harbours – qualified CbC report					
7.001	Qualified CbC Report	Informational	Tax	MR 1.13.1	
7.002	Profit (Loss) before Income Tax	Data Point	Finance/ Controllership	MR 1.13.1	2.2.1.3.a.2
7.003	Total Revenue	Data Point	Finance/ Controllership	MR 1.13.1	2.2.1.3.a.1
Transitional Safe Harbours – qualified financial statements					
7.004	Qualified Financial Statements	Informational	Finance/ Controllership	2022 SH 17	1.2.2.1
7.005	Current Tax Expense (excluding taxes that are not Covered Taxes)	Calculation	Finance/ Controllership	2022 SH 6.1	2.2.1.3.a.3
7.006	Deferred Tax Expense (excluding taxes that are not Covered Taxes)	Calculation	Finance/ Controllership	2022 SH 6.1	2.2.1.3.a.3
7.007	Uncertain Tax Positions	Data Point	Finance/Tax	2022 SH 6.1	2.2.1.3.a.3
7.008	Substance-based Income Exclusion	Data Point	Tax	MR 5.3.1, July 2023 AG 3.1.1	3.3.2
Transitional Safe Harbours – special rules and exclusions					
7.009	Special Rule for Tax Neutral UPEs	Informational	Finance/Tax	2022 SH 6.1	2.2.1.3.a
7.010	Profit (Loss) before Income Tax (and any associated taxes) of the UPE (if it is a flow-through or subject to Deductible Dividend Regime)	Data Point	Finance/Tax	2022 SH 6.1	2.2.1.3.a.2
7.011	Amount attributable to or distributed as a result of an Ownership Interest held by a Qualified Person	Data Point	Finance/Tax	2022 SH 6.1	2.2.1.3.a
7.012	Net Unrealized Fair Value Loss	Data Point	Finance/Tax	2022 SH 6.1	2.2.1.3.a
7.013	Goodwill impairment adjustments for transactions after November 30, 2021	Data Point	Finance/Tax	2022 SH 17.5, Dec 2023 AG 1.3	2.2.1.3.a
Transitional Safe Harbours – hybrid arbitrage arrangements					
7.014	List of Hybrid arbitrage arrangements	Informational	Finance/Tax	2022 SH 74.25-74.31, Dec 2023 AG 2.6	2.2.1.3.a
7.015	Type of hybrid arbitrage arrangements with date that arrangement was entered: • Deduction/non-inclusion arrangement • Duplicate loss arrangement • Duplicate tax recognition arrangement	Data Point	Finance/Tax	2022 SH 74.25-74.31, Dec 2023 AG 2.6	2.2.1.3.a
7.016	Tested Jurisdiction's Pre-tax book income with respect to any Hybrid Arbitrage Arrangements entered into after 15 December 2022	Data Point	Finance/Tax	2022 SH 74.25-74.31, Dec 2023 AG 2.6	2.2.1.3.a
7.017	Tested Jurisdiction's income tax expense with respect to any Hybrid Arbitrage Arrangements entered into after 15 December 2022	Data Point	Finance/Tax	2022 SH 74.25-74.31, Dec 2023 AG 2.6	2.2.1.3.a
7.018	Election - Simplified Calculations Safe Harbour (for NMCE)	Election	Tax	MR 8.2.1, Dec 2023 AG 6.4	2.2.1.2.a

Appendix H
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) and the GloBE Information Return Annex A1.

Abbreviations and acronyms:

AG - Administrative Guidance

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

SH - Safe Harbours

UPE - Ultimate Parent Entity

UTP - Uncertain Tax Position

UTPR - Undertaxed Profits Rule

WHT - Withholding Tax