



Finance (No. 2) Act 2023

2023 CHAPTER 30

PART 3

MULTINATIONAL TOP-UP TAX

CHAPTER 10

DEFINITIONS ETC

Miscellaneous

255 Pillar Two rules

- (1) In this Part references to the “Pillar Two rules” are to the Pillar Two model rules as interpreted in accordance with, and supplemented by—
- (a) the Pillar Two commentary, and
 - (b) any further commentaries or guidance published from time to time by the OECD that are relevant to the implementation of the Pillar Two model rules.

- (2) In [subsection \(1\)](#)—

“Pillar Two model rules” means the model rules published by the Organisation for Economic Co-operation and Development as “Tax Challenges Arising from the Digitalisation of the Economy – Global Anti-Base Erosion Model Rules (Pillar Two): Inclusive Framework on BEPS”;

“Pillar Two commentary” means the following—

- (a) the commentary on the Pillar Two model rules published by the Organisation for Economic Co-operation and Development as “Tax Challenges Arising from the Digitalisation of the Economy – Commentary to the Global Anti-Base Erosion Model Rules (Pillar Two)”, and
- (b) the examples illustrating the application of the Pillar Two model rules published by the Organisation for Economic Co-operation and

Status: *This is the original version (as it was originally enacted).*

Development as “Tax Challenges Arising from the Digitalisation of the Economy – Global Anti-Base Erosion Model Rules (Pillar Two) Examples”.

- (3) Pillar Two rules apply to a multinational group, or a member of a multinational group, in an accounting period if—
- (a) the group is a qualifying multinational group, or
 - (b) the group would be a qualifying multinational group but is not only as a result of Condition B in [section 129\(3\)](#) (requirement that at least one member located in the United Kingdom).