



IFA Malaysia webinar

Pillar Two: How Far Have We Come?

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| Date | 2 May 2024 |
| Time | 2:00 – 3.15 pm (Kuala Lumpur) |
| Location | Online |

The Pillar Two Model Rules (also referred to as the Global Anti-Base Erosion or GloBE Rules) are part of the Two-Pillar Solution to address the tax challenges of the digitalisation of the economy that was agreed by 137 member jurisdictions of the OECD/G20 Inclusive Framework on BEPS and endorsed by the G20 Finance Ministers and Leaders in October 2021. The rules are designed to ensure that large multinational enterprises (with revenues exceeding EUR 750 million) pay a minimum level of tax on the income arising in each of the jurisdictions where they operate. Whether or not adopted into a jurisdiction's legislative framework, this global minimum tax (GMT) regime will have an impact far beyond the confines of a country's legal system.

In Malaysia, the government's commitment to implement the GMT by 2025 was crystallised vide the Finance (No. 2) Act 2023 (Act 851), while Japan, Korea and New Zealand have already implemented the GMT as early as 1 January 2024. With Australia on track to adopt the GMT and income inclusion rule in 2024 and Singapore having also committed to a 2025 implementation date in this year's Budget announcement, it is timely for an update as we explore developments around the region.

Join us as we speak with leading experts on the far-reaching impact of the GloBE rules on businesses across the region, and how they will need to adapt to one of the most significant developments in international taxation today.

Our panel of speakers will update us on Pillar Two developments around the region and discuss the following aspects:

- Pillar Two: how different is it among jurisdictions?
- Early implementation issues, challenges & conflicts; and
- Impact on tax incentives & multinational enterprises.

Please register your attendance [here](#)

This is a complimentary event.

Moderator

Irene Yong
Head of Tax Advisory, Shearn Delamore & Co, Kuala Lumpur
IFA WIN – Malaysian Representative



Irene practices in all aspects of Tax and Revenue law advisory, structuring, planning, audits, investigations, dispute resolution and litigation and has appeared as counsel for taxpayers before the GST Appeal Tribunal, Customs Appeal Tribunal, the Special Commissioners of Income Tax and the Superior Courts of Malaysia. She also practises in the area of Personal Data Protection & Privacy Laws.

She has been recognized as Tax Counsel in the *Asia Pacific Legal 500*, *Benchmark Litigation Asia-Pacific*, *Chambers Asia Pacific*, *Expert Guides*, *Finance Monthly*, *The Legal 500 Asia-Pacific*, *Who's Who Legal*, *Business Today Lawyers Awards 2023*, and in successive editions of the *International Tax Review* rankings.

Panellists

Melinda Brown
Senior Transfer Pricing Adviser, OECD

Melinda is a senior advisor at the OECD's Centre for Tax Policy and Administration (CTPA) with over 20 years' experience in international tax, specialising in all aspects of transfer pricing practice, policy and law design. Melinda is an active member of the UN Transfer Pricing Subcommittee. As the head of a team supporting developing country members of the Inclusive Framework, Melinda has worked to assist capacity-constrained countries in addressing Base Erosion and Profit Shifting. Melinda has been the main author of the OECD's reports on Developing Countries and International Tax presented to G20 Finance Ministers each year since 2021.

In 2022, Melinda took up a position as a senior tax advisor in the OECD's Jakarta office where she is responsible for co-ordinating the OECD's relationship on tax matters with countries in Asia and the Pacific. Her current area of focus involves supporting jurisdictions in the region to participate in and implement the two-pillar solution to address the tax challenges of the digitalisation of the economy.

Annalise Foong
Flextax Consulting, Singapore



Annalise, founder of Flextax Consulting, has over two decades of experience in the areas of international tax, mergers, acquisitions and integrations, within both commercial and professional sectors. She holds qualifications as a Chartered Accountant (CAANZ), Lawyer (NSW, Australia) and is certified as a Sustainability and Climate Risk specialist.

Annalise specialises in international tax policy with an interest in Pillar Two and is dedicated to advancing ESG goals and positive peace. She has led numerous global implementation projects based on her project management and negotiation skills and ability to understand cross-functional requirements. She regularly contributes to tax publications and supports community tax education in order to foster a broader understanding of complex tax issues to facilitate more inclusive and informed tax policy conversations.

Amanda Kazacos
Senior Associate, King & Wood Mallesons, Australia



Amanda is a Senior Associate in the Taxation team at King & Wood Mallesons where she advises on all aspects of taxation law for large multinational corporations including on corporate acquisitions, divestments and restructures and international tax issues.

Amanda is currently on the NSW Women in Tax Committee of the Tax Institute of Australia and the Australian WIN representative of IFA.

Rachel Saw
Head, IBFD Asia-Pacific Office, Kuala Lumpur
IFA Malaysia Chair



Rachel is the Head of IBFD's Asia Pacific Office which is located in Kuala Lumpur, Malaysia. Rachel has extensive experience in dealing with cross-border tax issues from both a tax administration and tax policy perspective. Her work and expertise are currently focused on the region, with particular attention to the challenges faced by developing countries in today's tax environment.

Rachel regularly teaches in IBFD's International Tax Training courses and for the Malaysian Tax Academy and has also been an instructor for the Asian Development Bank, the OECD and on technical assistance programmes in Cambodia, Hong Kong and Myanmar. She is also the Chair of IFA Malaysia and a prominent speaker in regional circles.
