

Belgium Enacts Law Implementing Minimum Taxation Directive

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On 28 December 2023, Belgium enacted the law implementing the [Minimum Taxation Directive \(2022/2523\)](#) (Directive). The law takes effect as of 31 December 2023.

The parliament approved the law on 14 December 2023 (see [Parliament Adopts Global Minimum Tax Implementation Bill \(15 December 2023\)](#)).

The Directive, in short, seeks to ensure a global minimum level of taxation (at a rate of 15%) for multinational groups in the European Union. The deadline for its transposition into national law is 31 December 2023.

The full text of the law of 19 December 2023, published in Official Gazette No. 2023048529 of 28 December 2023, is available [here](#) (in Dutch) and [here](#) (in French).

Note: The Minimum Taxation Directive (2022/2523), adopted on 15 December by the Council of the European Union (see [Council Formally Adopts Minimum Taxation Directive \(16 December 2022\)](#)), aims to implement the Pillar Two Global anti-Base Erosion (GloBE) rules of the two-pillar approach to address the tax challenges of the digital economy, agreed by the members of the Organisation for Economic Co-operation and Development (OECD)/G20 Inclusive Framework in October 2021 (see [Vast Majority of Inclusive Framework Members Sign Up To Landmark Global Tax Reform \(11 October 2021\)](#)).