Belgium; European Union

Belgium Introduces Service for Questions on Law Implementing Minimum Taxation Directive

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Belgium has designed an Operational Expertise and Support Service (EOS)(Service Expertise Opérationnelle et Support (EOS)/dienst Operationele Expertise en Ondersteuning (OEO)) for questions regarding the application of the law implementing the Minimum Taxation Directive (2022/2523) (the Directive). Questions can be sent to the email address pillar2@minfin.fed.be.

For the full text of the announcing Decree of 19 January 2024, which was published in Official Gazette No. 2024000669 of 24 January 2024, see here (in Dutch) and here (in French).

Belgium enacted the law implementing the Directive, to ensure minimum global 15% taxation for multinational groups and large domestic groups in the EU, on 28 December 2023. The law came into effect on 31 December 2023 (see Belgium Enacts Law Implementing Minimum Taxation Directive (28 December 2023)).

Note: The Directive, 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)).

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