

Parliament Approves Draft Bill to Implement Minimum Global Taxation, Pillar Two Rules

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On 10 November 2023, the lower house of the parliament (*Bundestag*) approved a draft bill (Minimum Tax Directive Implementation Act (*Entwurf eines Gesetzes für die Umsetzung der Richtlinie zur Gewährleistung einer globalen Mindestbesteuerung für multinationale Unternehmensgruppen und große inländische Gruppen in der Union und die Umsetzung weiterer Begleitmaßnahmen*)) to implement the [European Union Minimum Taxation Directive \(2022/2523\)](#). For details of the bill, see [Government Approves Draft Bill to Implement Minimum Global Taxation \(18 August 2023\)](#).

The parliamentary procedure involved making minor amendments to the original draft bill. The amendments incorporate the [Agreed Administrative Guidance on the Global Anti-Base Erosion Model Rules](#) issued in February 2023 and the [Agreed Administrative Guidance on the Global Anti-Base Erosion Model Rules](#) issued in July 2023 into the draft bill. The approved bill also includes the QDMTT Safe Harbour and the transitional UTPR Safe Harbour.

The bill is still subject to approval by the Federal Council (*Bundesrat*).