

State Secretary for Finance Submits Amendment to Bill Implementing Minimum Taxation Directive to Parliament

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The State Secretary for Finance has submitted a first amendment to the bill implementing the minimum taxation (see [Government Submits Bill Implementing Minimum Taxation Directive for Parliamentary Approval \(1 June 2023\)](#)).

The main amendments include the following:

- the qualifying safe harbour rule for the domestic additional tax and the temporary safe harbour rule for the additional tax for undertaxed profits as agreed by the Inclusive Forum of the OECD (see [OECD Releases New Administrative Guidance with Safe Harbours for Pillar Two; Updates Standardized GloBE Information Return \(18 July 2023\)](#));
- the percentages used for the determination of exempt income based on real presence will be 9.8% for employment income and 7.8% for tangible assets;
- if unexercised, expenses from prior years related to share-based payments for an option will be added to the qualifying income or loss of a group entity in the year the option expires; and
- a general administrative measure is introduced that recognizes tax deferral as an alternative loss compensation deferral.

The text of the amendment is available [here](#) (in Dutch only).