

# Updates to Organisation for Economic Co-operation & Development (OECD) Pillar II

## Updates Coming in June 2026

### Pillar Two is transitioning from the implementation phase to execution, as jurisdictions introduce local legislation and release further administrative guidance.

Although adoption timelines and technical specifications differ across countries, numerous jurisdictions have now established filing requirements, making 2026 the inaugural year for substantial compliance, with multiple filing and reporting deadlines for initial Global Anti-Base Erosion Rules (GloBE) obligations. Strategic planning is essential due to the significant data demands, jurisdictional differences, and the coordination required among tax, finance, and technology teams.

Multinational enterprise (MNE) groups should closely monitor developments in each jurisdiction where they operate, including the adoption of the Income Inclusion Rule (IIR), the Under-Taxed Profits Rule (UTPR), and a Qualified Domestic Minimum Top-Up Tax (QDMTT), as well as any transitional relief, deferrals, or safe harbor provisions that may apply. While it is anticipated that U.S.-parented MNEs may be exempt from IIR/UTPR under the recent Side-by-Side System rules that are expected to take effect in 2026, they may still face compliance obligations for QDMTT in foreign jurisdictions. Early assessment is critical to identify compliance obligations, potential effective tax rate impacts, and upcoming notification and filing requirements.

#### Upcoming Global & U.S. Filings Deadlines:

##### June 30, 2026 – First GloBE Information Return (GIR) Filings

- Initial GIRs for in-scope MNE groups may be due as early as **June 30, 2026**, depending on jurisdiction for tax years ended December 31, 2024.
- Filing obligations may apply in multiple jurisdictions and, in some cases, require local QDMTT returns or notifications.
- MNE groups should confirm whether centralized GIR filing is available and where local filings are still required.

##### September & October 2026 – U.S. Income Tax Filing Season

- Pillar Two calculations and elections will need to be aligned with U.S. compliance, including:
  - Interaction with U.S. tax attributes and foreign tax positions
  - Alignment of Pillar Two data with U.S. financial and tax reporting

##### December 31, 2026 – Country by Country Reporting (CbCR)

- CbCR filings remain due by December 31 for calendar-year filers.
- CbCR continues to play a central role for Pillar Two, including:
  - Transitional CbCR Safe Harbor eligibility
  - Consistency of revenue, profit, tax, and employee data across disclosures
- Data quality and reconciliation between CbCR and GloBE calculations remain a key risk area.

Following the initial filings in June 2026, annual GIR and local QDMTT filings may generally be due by as early as March 31, 2027, subject to local law and any available extensions or transitional relief.

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## How Forvis Mazars Can Help

Forvis Mazars helps U.S.-parented and [foreign-parented MNE groups](#) navigate Pillar Two compliance from readiness through ongoing reporting. Our services include:

- Pillar Two Readiness, Scoping, & Impact Assessment
- Pillar Two Data Strategy & Collection
- GloBE Calculations & GIR Filing & Reporting
- Country by Country & Public Country by Country Reporting
- Pillar Two Technology & Automation Offerings
- Pillar Two Filing Readiness & Global Coordination

## Contact Us

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