

E-learning webinar:

Event Code: EWEB25082501

BEPS 2.0 Pillar Two webinar series: Overview of Pillar Two and related Hong Kong and international developments

About the topic

Against the background of the Inland Revenue (Amendment) (Minimum Tax for Multinational Enterprise Groups) Ordinance 2025, which is now in effect, the Taxation Faculty is organising a series of e-seminars to provide members with a better understanding of the implications of the Organisation for Economic Co-operation and Development (OECD)'s Base Erosion Profit Shifting initiative and action plans (BEPS), with a particular focus on Pillar Two measures. In brief, we will provide an overview of Pillar Two and its international development, discuss its implementation in Hong Kong (HK), navigate the compliance and reporting requirements, and explore next steps for multinational enterprise (MNE) groups in HK.

Over 130 jurisdictions in the OECD/G20 Inclusive Framework on BEPS agreed a two-pillar approach to address the tax challenges arising from the digitalisation of the economy, in 2021. Pillar Two introduces a global minimum effective tax rate to be imposed on MNE groups with consolidated revenue of €750 million or above. A number of jurisdictions, including European Union countries, the United Kingdom, Australia, Canada and Vietnam, have already implemented the Global Anti-Base Erosion (GloBE) rules and a domestic top-up tax (DMT) of 15%, commencing from 2024.

To fulfil HK's international obligation to tackle cross-border tax evasion and safeguard its taxing rights, the above ordinance was passed by the Legislative Council on 28 May 2025. Following this, HK has implemented the GloBE rules and introduced a Hong Kong DMT for MNE groups with fiscal years starting on or after 1 January 2025.

In this webinar, the speakers will

- Introduce the background of the BEPS 2.0 initiative
- Provide an overview of the GloBE rules and DMT
- Summarise the development and implementation status of the GloBE rules in different jurisdictions

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About the event

Date & time	Monday, 25 August 2025 1:00 p.m. – 2:00 p.m.
Format	Live webinar
Fee	<ul style="list-style-type: none">• Taxation Faculty member: HK\$230• HKICPA member or student; and IA: HK\$270• Non-member: HK\$400 <i>Not a faculty member? Click here to join.</i>
Language	English
HKICPA CPD credit	1 hour (subject to actual attendance)
Rating	Intermediate level*
Competency	Taxation*
Application deadline	Online registration by 21 August 2025 (offline registration by 20 August 2025)

Speakers

Irene Lee
Partner, Global Transfer Pricing Services, KPMG China

Tanya Trantallis
Tax Director, KPMG China

Chair

Eugene Yeung
Chair, Taxation Faculty Executive Committee, and Partner, Business Tax Advisory, KPMG China

* Please refer [here](#) for descriptions of the various ratings.



About the speakers

Irene Lee

Partner, Global Transfer Pricing Services, KPMG China

Irene is a partner in KPMG's Hong Kong transfer pricing (TP) team and has more than 15 years' experience working as a full time TP specialist and providing services to leading regional and multinational groups. Irene has worked with a variety of TP clients and dealt with range of TP-related issues. She has extensive experience in coordinating different regional and global assignments, including TP risk assessments, policy design/formation, structural planning and supporting, as well as providing regional coordination for master file preparation following the BEPS action plan releases, and assisted clients in preparing local country TP documentation, for multinational corporations and banks that have entities in the Asia Pacific region.

Tanya Trantallis

Tax Director, KPMG China

Tanya has been involved in a wide range of TP projects, including documentation for clients covering different industries, including manufacturing, trading, retail, telecommunications and financial services (United States and European investment banks in mainland China and the Asia region, global asset managers, private equity houses), treasury transfer pricing studies, TP planning, business model optimisation and supply chain planning projects, cost allocation projects, audit defence as well as application for corresponding adjustment relief for both multinational corporations and local Chinese clients.

Disclaimer

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- The Institute takes no responsibility for any loss incurred by any person acting or refraining from acting as a result of participation in the event.

Registration

- **Online enrolment by 21 August; offline enrolment by post or email also by 20 August:**

Complete the enrolment form and return it to the Institute by 20 August, together with full payment. Cheque should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". E-mail registration will be accepted for payment by any VISA/ Master card or the BOC HKICPA UnionPay card.

You may consider your registration to be successful unless you receive notification from us to the contrary.

- Upon successful enrolment, the meeting URL and login password will be provided nearer the event date.
- **Contact Mr. Terry Lam at 2287-7386 for enquiry.**