



MALTA
INSTITUTE
OF TAXATION

MIT Series: Global Minimum
Tax Rules

February - June 2024

MIT Series: Global Minimum Tax Rules

This short course is intended to provide a deep-dive into the Global Minimum Tax framework.

Programme Description: The programme covers the following topics over 5 lectures:

Session 1: Scope of GloBE Rules & mapping out the MNE Group

- Monetary threshold (including rebasing of monetary thresholds, deemed consolidation test, etc.)
- Defining members of an MNE Group (i.e., controlling interest notion, deemed consolidation test)
- Types of Constituent Entity (UPE, IPE, POPE, Hybrid Entity, Main Entity, PE, Stateless ...)
- Excluded Entities
- Location of Constituent Entities

Session 2: [Part 1]: The components of the Jurisdictional ETR: GloBE Income or Loss

- Departure point: Financial Accounting Net Income or Loss (FANIL)
- Article 3.1.2. Adjustments
- Treatment of Main Entities vs. PEs + PE loss importation / recapture rules
- Arm's length adjustments
- Intra-Group Financing exception
- International Shipping Income Exclusion
- Elections (Realisation election, Aggregate Asset Gain or Loss election)

Session 3: [Part 2]: The components of the Jurisdictional ETR: Adjusted Covered Taxes

- Departure point: Current tax expense as per financial accounts
- Notion of Covered Taxes with specific reference to DRIT.
- Total Deferred Tax Adjustment Amount
- Deferred Tax Recapture Rules
- Allocation of Covered Taxes to Constituent Entities (incl. Blended CFC Tax Rule)
- GloBE Loss Election

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Session 4: Determining the Top-up Tax Amount & the Inclusion Rules

- Jurisdictional ETR formula
- Concept of Excess Profits & SBIE Amount
- Allocation of Top-up Tax Amount to Constituent Entities
- Concept of Additional Current Top-up Tax Amount and associated allocation rules
- The QDMTT
- The IIR
- The UTPR

Session 5: Transitional Rules, Compliance Obligations & Safe-harbours

- Article 9.1.1, 9.1.2, 9.1.3. regarding transitional attributes
- Chapter 8 – GloBE Information Return
- The CbC Safe Harbours

It is recommended that participants familiarize themselves with the basics of the following topics:

- The requirement to consolidate the results of an entity on line-by-line basis under financial accounting principles (IFRS)
- IAS 12 – deferred taxes
- Country-by-country Reporting

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PROGRAMME DETAILS

- **5 lectures** (2 hours each) in February 2024 *[timetable below]*
- **Online**
- **10 Core CPE hours**
- **A Certificate of Attendance** will be given to attendees
- **No assessment**
- **Option** to follow the **full programme** (5 lectures) or any session [Session 2 and 3 have to be taken as a set]
- Fee:
 - Full Course: MIT Member €175; Non-Members €245; Students €140
 - One Lecture: MIT Member: €45; Non-Members €60; Students €35
 - Set of Two Lectures: MIT Member €90; Non-Members €120; Students €70
 - MIT Members are also eligible to claim their 2 complimentary CPE events. To claim the offer kindly contact mit@maintax.org – Terms & Conditions Apply

Timetable

DATE	DETAILS			
15 February 2024	Session 1	Scope of GloBE Rules & mapping out the MNE Group	Christopher Bergedahl	13.00 – 15.00
13 March 2024	Session 2 [Part 1]	The components of the Jurisdictional ETR: GloBE Income or Loss	Christopher Bergedahl	13.00 – 15.00
17 April 2024	Session 3 [Part 2]	The components of the Jurisdictional ETR: Adjusted Covered Taxes	Graziella Demanuele Bianco	10.00 – 12.00
15 May 2024	Session 4	Determining the Top-up Tax Amount & the Inclusion Rules	Silvio Camilleri	10.00 – 12.00
12 June 2024	Session 5	Transitional Rules, Compliance Obligations & Safe harbours	Steve Gingell & Michael Borg	13.00 – 15.00

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