Private Breakfast Roundtable: 2026 Pillar 2 Tax Ecosystem

Question 1 | GIR deadline readiness

On-screen wording	How prepared is your group today for the forthcoming GIR filing deadline?
Response format	Multiple choice
Response options	

We are ready / close to filing-ready	13%
We have the process, but data quality is still an issue	19%
We are still working through governance / ownership	13%
We are behind and expect material difficulties	13%
Too early to tell	44%

Question 2 | Biggest immediate obstacle

On-screen wording	What is your biggest immediate obstacle to GIR compliance? (Please select up to two.)
Response format	Poll (select up to 3)
Response options	

Data collection across jurisdictions	53%
Interpreting the rules consistently	40%
Systems / technology limitations	13%
Safe harbour eligibility assessment	0%
Coordination with local finance / tax teams	20%
Data Readiness for Simplified ETR Adjustments	0%
Time and resource constraints	33%
Multi-Entity Cyprus Structures and Constituent Entity Data Collection	20%

Question 3 | Priority ranking for the session

On-screen wording	Please rank the topics you most want this session to focus on today.
Response format	Ranking
Response options	

GIR filing readiness	2.36
Reducing Top-up Tax / cash tax leakage	4.91
Safe harbours (including Simplified ETR Safe Harbour Election Strategy)	3.09
Restructurings / M&A under Pillar Two	2.18
Substance-Based Tax Incentives (QTI) Practical Application (applicable on or after 01/01/2026)	5.09
Transition tax attributes	1.82
Audit defence / documentation	1.91
Simplified ETR Safe Harbour Election Strategy (early adoption 2026)	2.45

Question 4 | Principal tax minimisation lever

On-screen wording	Where do you see the greatest opportunity to reduce Pillar Two cash tax exposure in your group? (Please select up to two.)
Response format	Poll (select up to 3)
Response options	

Safe harbours	42%
Simplified ETR Entry/Re-Entry Test	0%
Substance-based income exclusion	17%
Deferred Tax Liability Recapture and Cyprus Timing	0%
Holding-chain restructuring: Stateless Entities and Cyprus Holding Structures	8%
Transitional CbCR Safe Harbour Qualification (one-year extension)	8%
Transition attribute optimisation	0%
We are focused first on compliance, not optimisation	25%

Question 5 | Safe harbour position

On-screen wording	Which statement best describes your current safe harbour position?
Response format	Multiple choice
Response options	

We expect to rely on safe harbours in several jurisdictions	27%
We may rely on them, but eligibility is still uncertain	18%
We do not currently expect material safe harbour coverage	0%
We are still assessing	36%
Not sure	27%

Question 6 | U.S. footprint screen

On-screen wording	Does your group have a material U.S. footprint that could make U.S.-specific Pillar Two planning or safe harbour analysis relevant?
Response format	Multiple choice
Response options	

Yes, significant U.S. operations	8%
Yes, limited / selective U.S. operations	23%
No U.S. footprint	69%
Unsure	0%

Question 7 | Article 6.2 – entities joining and leaving the group

On-screen wording	In the last 24 months, has your group had acquisitions, disposals, carve-outs, or entities joining / leaving the group that may affect Pillar Two?
Response format	Multiple choice
Response options	

Yes, and we have already assessed the Pillar Two consequences	27%
Yes, but only at a high level	27%
Yes, and this remains an open issue	18%
No	27%
Unsure	0%

Question 8 | Article 6.3 – transfer of assets and liabilities

On-screen wording

Have you analysed whether any recent or planned internal / external asset transfers could create unexpected Pillar Two consequences through gain recognition, carrying values, or step-up issues?

Response format

Multiple choice

Response options

Yes, fully analysed	0%
Partially analysed	18%
Not yet analysed	55%
This is likely relevant to us	9%
Not relevant	18%

Question 9 | Article 9.1 – transition tax attributes

On-screen wording

How confident are you that pre-Pillar Two losses, deferred tax assets / liabilities, and other transition tax attributes (transaction that takes place after 30 November 2021 and before the commencement of a Transition Year) have been correctly identified and positioned for Pillar Two purposes?

Response format

Multiple choice

Response options

High confidence	0%
Reasonable confidence, but some open points remain	22%
Low confidence	33%
We have not yet done a full review	22%
Not sure	22%

Question 10 | Article 6.4 – joint ventures

On-screen wording

Do you have any JVs or JV-like structures that are accounted for under the equity method and could therefore require separate Pillar Two analysis?

Response format

Multiple choice

Response options

Yes, several	27%
Yes, one or two material JVs	36%
Possibly, but we have not assessed them fully	0%
No	36%
Unsure	0%