# Private Breakfast Roundtable: 2026 Pillar 2 Roadmap

## 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 | 33% |
| We have the process, but data quality is still an issue | 33% |
| We are still working through governance / ownership | 13% |
| We are behind and expect material difficulties | 7% |
| Too early to tell | 13% |

## 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 | 60% |
| Interpreting the rules consistently | 40% |
| Systems / technology limitations | 13% |
| Safe harbour eligibility assessment | 20% |
| Coordination with local finance / tax teams | 13% |
| Data Readiness for Simplified ETR Adjustments | 13% |
| Time and resource constraints | 13% |
| Multi-Entity Cyprus Structures and Constituent Entity Data Collection | 7% |

## 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 | 3.93 |
| Reducing Top-up Tax / cash tax leakage | 2.93 |
| Safe harbours (including Simplified ETR Safe Harbour Election Strategy) | 4 |
| Restructurings / M&A under Pillar Two | 2.86 |
| Substance-Based Tax Incentives (QTI) Practical Application (applicable on or after 01/01/2026) | 2.5 |
| Transition tax attributes | 1 |
| Audit defence / documentation | 2.21 |
| Simplified ETR Safe Harbour Election Strategy (early adoption 2026) | 2.36 |

## 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 | 36% |
| Simplified ETR Entry/Re-Entry Test | 0% |
| Substance-based income exclusion | 14% |
| Deferred Tax Liability Recapture and Cyprus Timing | 0% |
| Holding-chain restructuring: Stateless Entities and Cyprus Holding Structures | 29% |
| Transitional CbCR Safe Harbour Qualification (one-year extension) | 0% |
| Transition attribute optimisation | 0% |
| We are focused first on compliance, not optimisation | 21% |

## 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 | 71% |
| We may rely on them, but eligibility is still uncertain | 21% |
| We do not currently expect material safe harbour coverage | 0% |
| We are still assessing | 14% |
| Not sure | 0% |

## 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 | 21% |
| Yes, limited / selective U.S. operations | 14% |
| No U.S. footprint | 64% |
| 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 | 47% |
| Yes, but only at a high level | 13% |
| Yes, and this remains an open issue | 33% |
| No | 0% |
| Unsure | 7% |

## 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 | 7% |
| Partially analysed | 33% |
| Not yet analysed | 33% |
| This is likely relevant to us | 7% |
| Not relevant | 20% |

## 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 | 7% |
| Reasonable confidence, but some open points remain | 53% |
| Low confidence | 7% |
| We have not yet done a full review | 33% |
| Not sure | 0% |

## 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 | 13% |
| Yes, one or two material JVs | 33% |
| Possibly, but we have not assessed them fully | 33% |
| No | 20% |
| Unsure | 0% |