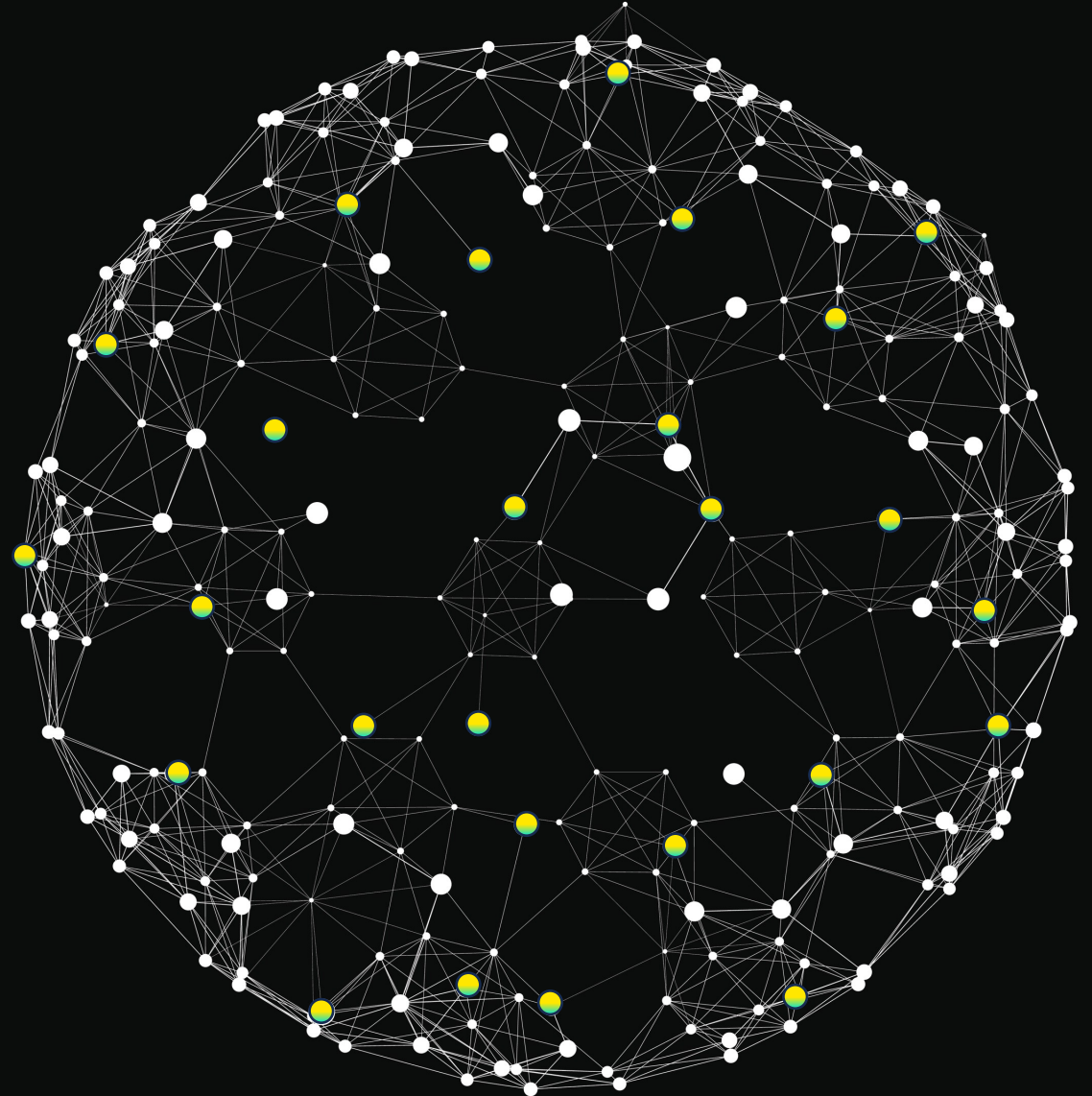


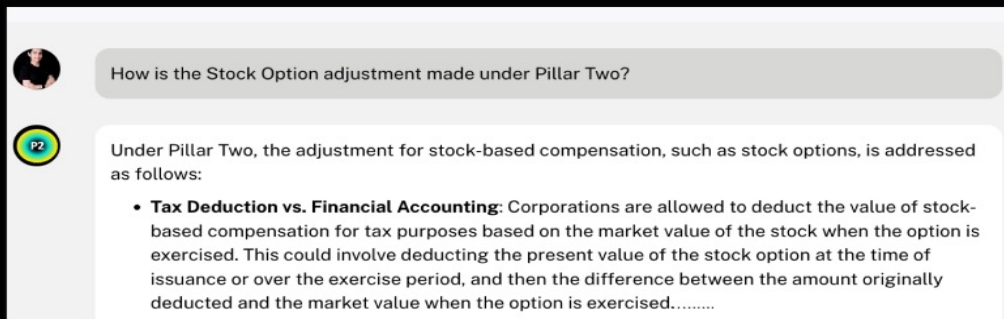
Pillar Two: Generative AI

Connecting the dots to understand
Global Implications



Pillar Two Probot: A Generative AI Bot

Get accurate and reliable answers to challenging Pillar Two questions in seconds. Our Pillar Two Probot is a customized AI model trained on OECD Pillar Two.



How is the Stock Option adjustment made under Pillar Two?

Under Pillar Two, the adjustment for stock-based compensation, such as stock options, is addressed as follows:

- **Tax Deduction vs. Financial Accounting:** Corporations are allowed to deduct the value of stock-based compensation for tax purposes based on the market value of the stock when the option is exercised. This could involve deducting the present value of the stock option at the time of issuance or over the exercise period, and then the difference between the amount originally deducted and the market value when the option is exercised.....

Make better decisions by getting answers to your practical case study-based questions

Unlock the power of AI to easily navigate through complex Pillar Two Rules and solve your real-world practical queries with verifiable research.

Revolutionize your research with power of **Artificial Intelligence**

Undertake quick and accurate research on OECD Pillar Two with AI solution, specifically engineered and trained on Pillar Two.



Company A received a total Dividend of EUR 150. Out of this, a dividend of EUR 25 is received from Company B, in which Company A has held shares carrying 8% ownership interest for the past 19 months. A dividend of EUR 75 is received from Company C, in which Company A has held shares carrying 25% ownership interest for the past 13 months. Balance, EUR 50 dividend is received from Company D, which is not a related entity. How will this dividend be treated from Pillar Two perspective in case of Company A. Please provide citation, Article and Para reference of source file in the response.

The treatment of dividends received by Company A from Companies B, C, and D under the Pillar Two rules can be inferred from the context provided:

- **Dividend from Company B (EUR 25):**
 - Company A has held an 8% ownership interest in Company B for 19 months. According to the context, dividends received on shares held for more than 12 months are likely to be treated as Excluded Dividends under Article 3.2.1(b) of the GloBE Rules.

Thank You

Sunny Bilaney, Co-founder
TPNOMIX Private Limited
Email: sunny@tpnomix.com
Telephone: +91 9833708332
Website: www.tpnomix.com