OECD SECRETARY-GENERAL TAX REPORT TO G20 FINANCE MINISTERS AND CENTRAL BANK GOVERNORS

G20 South Africa, February 2025

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BETTER POLICIES FOR BETTER LIVES

OECD Secretary-General Tax Report to G20 Finance Ministers and Central Bank Governors

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Introduction

Ahead of the first G20 Finance Ministers' and Central Bank Governors' meeting under the South African G20 Presidency, I am pleased to report to you on key tax developments since my last report to you in October 2024.

The **South African presidency of the G20** has set out an ambitious agenda focusing on its **priority themes of solidarity, equality, and sustainability**. The OECD is committed to working with South Africa and other G20 members to deliver on a suite of reports on international tax co-operation issues to mobilise domestic resources, enhance tax certainty, and tackle inequality. I also will provide regular reports on longstanding G20 priorities such as tax transparency, addressing base erosion and profit shifting (BEPS), and the Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy agreed in October 2021.

Since you last met, the Co-Chairs of the G20/OECD Inclusive Framework on BEPS issued an **update on the progress in the development of a final package for Pillar One**[1] of the Two-Pillar Solution. This package includes two components: a text of the Multilateral Convention (MLC) to implement Amount A and a linked framework for Amount B. The statement acknowledged the significant progress made in 2024 to resolve a small number of disagreements on the MLC text. Consequently, the text has remained stable, with only one jurisdiction objecting to the text's adoption in June 2024. Since that point, the negotiations have been focused on resolving the outstanding issues with the Amount B Framework, which have also made significant strides in recent months as only a few outstanding issues remain amongst certain jurisdictions.

The ongoing implementation of **tax transparency standards** around the globe continues to deliver outstanding results for member jurisdictions of the Global Forum on Transparency and Exchange of Information for Tax Purposes. The Global Forum's November 2024 plenary saw the adoption of additional standards on reporting of crypto-assets, with 66 jurisdictions now agreeing to begin exchange of information in 2027 or 2028, and 48 jurisdictions already beginning to implement their commitment by signing the CARF Multilateral Competent Authority Agreement in November 2024.

The common approach to establishing a global minimum tax under Pillar Two continues to draw interest from a broad range of developed, emerging, and developing economies. As of January 2025, there are 55 jurisdictions that have already enacted or introduced legislation to implement the Global Anti-Base Erose (GloBE) rules. A further 10 jurisdictions have taken concrete steps toward implementation.

[1] https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/beps/pillar-one-update-co-chair-statement-inclusive-framework-on-beps-january-2025.pdf

Support for G20 Initiatives

The OECD is pleased to contribute its expertise on tax and fiscal policy matters in support of the ambitious work programme set out by the South African presidency of the G20 by leveraging our resources in providing data-driven, evidence-based policy research.

As outlined in greater detail further below, the OECD will support the G20/OECD Inclusive Framework on BEPS (Inclusive Framework) in its consideration of the interaction of tax policy, inequality, and growth. By relying on data and economic analysis, and by facilitating the sharing of experiences on domestic policy tools, this work will provide research to inform future political discussions by member governments. Your invitation to the Inclusive Framework follows from your statement last July and builds on a report[2] prepared by the OECD examining interactions between taxation and inequality by exploring how tax systems can mitigate or exacerbate inequality and identifying scope for potential reforms. The Inclusive Framework will take this issue up at its next Plenary meeting in April.

The OECD will support the Inclusive Framework in undertaking a broad-based stock-take to look at the progress and impact of international co-operation over the past 15 years with a view to identify opportunities to optimise resource allocation and co-operation between international organisations to ensure cost-effective and efficient outcomes.

As requested, we will continue to participate in work ensuring that BEPS implementation drives domestic resource mobilisation to help governments achieve the Sustainable Development Goals, in part by ensuring effective implementation of international tax reforms is paired with appropriate technical support to low-capacity countries while also strengthening tax administrations to be more effective and efficient.

The OECD welcomes the opportunity to report on our plans to bring simplifications and concrete proposals to foster tax certainty and reduce compliance costs for both taxpayers and tax administrations. We will help in identifying ways to simplify international tax rules to make them easier to implement, particularly for developing countries, while also promoting and improving tax certainty to reduce compliance costs for taxpayers and tax administrations and foster growth and cross-border investments.

Finally, the OECD looks forward to providing a report on potential scoping for an international framework to promote additional implementation of automatic exchange of readily available information regarding real estate, and working with interested countries to assess the feasibility of further enhancing tax transparency on real estate by providing tax administrations cross-border access to information in ownership registers.

[2] OECD (2024), Taxation and Inequality: OECD Report to G20 Finance Ministers and Central Bank Governors, OECD Publishing, Paris, https://doi.org/10.1787/8dbf9a62-en.

Two-Pillar International Tax Package

Pillar One – Inclusive Framework Co-Chair Update on a Pillar One Package

Pillar One is a package informed by the objective of modernising international tax standards to secure certainty and stability, avoid double taxation risked by unilateral measures, protect tax bases, and foster growth. It includes two components: Amount A, a co-ordinated framework memorialised in a multilateral convention (MLC) that establishes an agreed approach to taxation of large and highly profitable MNEs, preventing proliferation of destabilising unilateral measures; and Amount B, a simplified and streamlined approach to the application of the arm's length principle to in-country baseline marketing and distribution activities, with a particular focus on the needs of low-capacity jurisdictions. While building consensus on such reforms is challenging and takes time, as recently reported by the Inclusive Framework Co-chairs in their statement issued on 13 January,[3] significant progress has already been made in building consensus on fundamental aspects of the package, and only a few issues remain where the Co-chairs and Inclusive Framework members remain collectively committed to do their utmost to bridge the last gaps.

> "We remain committed to do our utmost to help bridge the last few remaining issues relating to the Amount B Framework in order to secure IF agreement on the Pillar One package and remain committed to ensuring that the IF is prepared to support swift implementation once that agreement is reached."
>
> Inclusive Framework Co-Chairs, 13 January 2025

Amount A

In order to improve tax certainty, avoid double taxation, and protect tax bases, Amount A introduces a system for a co-ordinated allocation of taxing rights to market jurisdictions with respect to a defined portion of the residual profits of the largest and most profitable MNEs. It is designed to be a sustainable, co-ordinated reform of the international tax system that responds to the tax challenges arising from the digitalisation of the economy, reinforces stability and certainty for taxpayers, and provides for the withdrawal and standstill of Digital Services Taxes (DSTs) and Relevant Similar Measures (RSM) with respect to all companies.

As reported by the Co-chairs, negotiations in the first half of 2024, informed by feedback from domestic consultations following the release of the MLC text in 2023, led to the successful resolution of the issues standing in the way of adoption of the text. Specifically, the MLC text was revised to:

- Clarify the definition of DSTs and RSMs, including with respect to the application of the de facto ring-fencing criteria;
- Provide an election for common application of the MLC to a non-State jurisdiction and the State responsible for its international relations, subject to certain guardrails and measures to limit the additional elimination of double tax obligations that might fall on other States as a result of such an election; and
- Provide further modifications within the Marketing and Distribution Profit Safe Harbour (MDSH) when calculating the excess profit of a Multinational Enterprise in a market jurisdiction with lower income levels, including a higher return on revenue (ROR) metric and higher deductions (so-called "reduction factors") within the withholding tax upward adjustment mechanism.

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[3] https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/beps/pillar-one-update-co-chair-statement-inclusive-framework-on-beps-january-2025.pdf

In June 2024, the revised MLC text was submitted to the Inclusive Framework for adoption. Members were informed that, in line with international law, agreement to adopt the final text does not create an obligation to sign it, with the decision to sign the text being a separate decision for jurisdictions and one that might follow specific domestic procedures, including the need to secure legislative ratification. Only one member objected to the text's adoption, citing the absence of consensus having been reached on the Amount B Framework, as set out below, and citing the fact that another member's agreement to the adoption of the text was accompanied by a reservation on whether or not it would sign as a result of it not being in a position to support certain aspects. The text has remained stable since that point with the negotiations having been focused on resolving the outstanding issues with the Amount B Framework.

Amount B

Amount B enhances tax certainty by defining a simplified and streamlined transfer pricing approach that applies to a broad scope of baseline marketing and distribution activities, which was incorporated in the OECD Transfer Pricing Guidelines[4] as an elective framework.

On 19 December 2024, the OECD released new tools[5] to facilitate the implementation of Amount B. The tools are designed to automatically compute the Amount B returns, requiring only minimal data inputs and will further optimise the administrative and simplification benefits for both tax administrations and taxpayers.

Building on that optional model, discussions have continued on a framework under which jurisdictions that become parties to the Amount A MLC would, from the point the MLC enters into effect, commit to apply Amount B to local taxpayers performing in-country baseline marketing and distribution activities where the transaction is covered by an income tax treaty in force with another Inclusive Framework member jurisdiction that is also a Party to the MLC. Jurisdictions would also commit to respect outcomes determined under Amount B when applied by other parties to the MLC with which an income tax treaty is in force (the "Amount B Framework").

While acknowledging the significant tax certainty benefits already provided to in-scope groups through the MLC - including the availability of robust binding dispute resolution for a broad range of related transfer pricing and profit attribution disputes and a framework for the withdrawal and standstill of DSTs and RSMs - some members have taken the position that the Amount B Framework is an essential part of the overall Pillar One package.

Significant work has been undertaken on the detailed parameters of the Amount B Framework with only a few outstanding issues remaining amongst certain jurisdictions. Members are still discussing to find a path forward that has the support of all members in order to arrive at a solution that is able to achieve consensus.

> "We welcome the progress made on the Two-Pillar Solution under the IF. We reiterate our commitment to the October 2021 Statement of the IF and to the swift implementation of the Two-Pillar Solution by all interested jurisdictions, including expeditious negotiations on the final package of Pillar One."
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> G20 RIO DE JANEIRO LEADERS' DECLARATION Rio de Janeiro, Brazil, 18-19 November 2024

[4] OECD (2022), *OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2022*, OECD Publishing, Paris, https://doi.org/10.1787/0e655865-en.

[5] https://www.oecd.org/en/about/news/announcements/2024/12/release-of-new-tools-for-the-implementation-of-amount-b-relating-to-the-simplification-of-transfer-pricing-rules.html.

Pillar Two – Supporting implementation through additional guidance

Pillar Two is comprised of two complementary components: the Global Anti-Base Erosion (GloBE) Rules,[6] and the subject-to-tax rule[7].

Subject to tax rule (STTR)

The STTR allows jurisdictions to “tax back” where defined categories of income are subject to nominal tax rates below the STTR minimum rate of 9%, and domestic taxing rights over that income have been ceded under a treaty. The STTR forms part of the Pillar Two package of rules aimed at ensuring global minimum taxation of multinational enterprises and complements and takes priority over other rules agreed in that package.

More than 70 developing country members of the Inclusive Framework are eligible to request inclusion of the STTR in their agreements with other members of the Inclusive Framework in accordance with the commitment on the STTR, either through the bilateral amendments to tax agreements or the new multilateral treaty (STTR MLI). The STTR MLI was approved by the Inclusive Framework in September 2023 and 19 Inclusive Framework members signed the MLI (or a letter of intention to sign the MLI as soon as possible) on 19 September 2024, with 24 signing an adjacent letter of support.

The Inclusive Framework is continuing to support the implementation of the commitment on the STTR, including a tool to monitor progress against that commitment.

Global Minimum Tax

The global minimum tax, a common approach which countries may elect to implement, raises the floor for minimum taxation of cross border profits of large multinational enterprises to level the playing field, protect tax bases and ensure economic investment decisions.

To date, 55 jurisdictions have already implemented or are planning to implement the global minimum tax with effect from January 2024 or 2025. Additionally, 10 jurisdictions have taken concrete steps towards implementation of the global minimum tax, including through a formal announcement indicating an intention to implement at a later stage.

Since I last reported to you, the Inclusive Framework, in response to strong interest among delegates and stakeholders, has agreed and released several key documents on 15 January 2025:

- a central record of legislation which have secured qualified status under the Transitional Qualification Mechanism[8]. This document will be updated on a regular basis and in a timely manner, to include additional minimum tax legislation that has completed the fast-track process.

[6] For further details on the GloBE Rules, see: https://www.oecd.org/en/topics/sub-issues/global-minimum-tax/global-anti-base-erosion-model-rules-pillar-two.html

[7] For more information on the STTR, see: https://www.oecd.org/en/topics/subject-to-tax-rule.html

[8] OECD (2025), *Tax Challenges Arising from the Digitalisation of the Economy – Administrative Guidance on the Global Anti-Base Erosion Model Rules – Central Record*, OECD/G20 Inclusive Framework on BEPS, OECD, Paris, https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/global-minimum-tax/administrative-guidance-globe-rules-pillar-two-central-record-legislation-transitional-qualified-status.pdf.

- Administrative Guidance[9] on the treatment under Article 9.1 of the GloBE Model Rules of certain tax benefits which was agreed in connection with the release of the central record.
- the updated GloBE Information Return[10] (which is a standardised information return that implementing jurisdictions will use to evaluate the correctness of a constituent entity's liability under its minimum tax rules) together with a supporting GIR XML Schema and User Guide[11] and a Multilateral Competent Authority Agreement on the Exchange of GloBE Information[12] to facilitate central filing and automatic exchange of GloBE Information Return information.

These documents have been released to further facilitate the consistent and co-ordinated implementation and administration of the rules by implementing jurisdictions.

BEPS Update

The foundation for the work of the Two-Pillar Solution is the BEPS Project, which began over a decade ago by diagnosing the vulnerabilities in the existing system that enabled base erosion and profit shifting and agreeing 15 potential actions to address these vulnerabilities. Of the 15 Actions, four were established as minimum standards.

Implementation of the minimum standards

Action 5 – Harmful tax practices

The Action 5 minimum standard addresses harmful tax practices through peer review and exchange of information. Peer review assessments are carried out annually on more than 130 jurisdictions. When the BEPS Project began, virtually no information on tax rulings was being exchanged. As of December 2024, over 58 000 exchanges of rulings have taken place based on our most recent data and the Forum on Harmful Tax Practices (FHTP) has now reviewed 332 regimes. Almost all regimes are now in line with the prevailing standard and over 40% of those regimes have been (or in the process of being) abolished.

Further, the 11 no or nominal tax jurisdictions have been reviewed under Action 5 for the fifth consecutive year and have all introduced economic substance requirements. The next annual monitoring exercise for no or only nominal tax jurisdictions will take place in the second half of 2025.

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[9] OECD (2025), *Tax Challenges Arising from the Digitalisation of the Economy – Administrative Guidance on Article 9.1 of the Global Anti-Base Erosion Model Rules*, OECD/G20 Inclusive Framework on BEPS, OECD, Paris, https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/global-minimum-tax/administrative-guidance-article-9-1-globe-rules-pillar-two-january-2025.pdf.

[10] OECD (2025), *Tax Challenges Arising from the Digitalisation of the Economy – GloBE Information Return (January 2025): Inclusive Framework on BEPS*, OECD/G20 Base Erosion and Profit Shifting Project, OECD Publishing, Paris, https://doi.org/10.1787/a05ec99a-en.

[11] OECD (2025), *GloBE Information Return (Pillar Two) XML Schema: User Guide for Tax Administrations*, OECD Publishing, Paris, https://doi.org/10.1787/c594935a-en.

[12] OECD (2025), *Tax Challenges Arising from the Digitalisation of the Economy – Multilateral Competent Authority Agreement on the Exchange of GloBE Information (January 2025)*, OECD/G20 Inclusive Framework on BEPS, OECD, Paris, https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/global-minimum-tax/multilateral-competent-authority-agreement-exchange-of-globe-information.pdf.

Action 6 – Tax treaty abuse

Action 6 is focused on strengthening tax treaties with anti-abuse measures to ensure that they do not open unintended opportunities for non-taxation or reduced taxation (including through treaty shopping arrangements).

The implementation of Action 6 measures is primarily facilitated through a multilateral instrument (the BEPS MLI) which implements the Action 6 minimum standard along with other treaty-related BEPS measures. The implementation of the BEPS Action 6 minimum standard has progressed rapidly and steadily over the last several years, due mostly to the entry into effect of the provisions of the BEPS MLI (with most newly concluded tax treaties now also include provisions implementing the Action 6 minimum standard).

- To date, the BEPS MLI covers 104 jurisdictions (of which 88 have already ratified) and over 1 960 bilateral tax treaties.
- The BEPS MLI has already effectively modified over 1 500 of those bilateral tax treaties (with an additional 460 treaties to be effectively modified once all Signatories ratify); most jurisdictions that have signed the BEPS MLI have listed all, or almost all, of their tax treaties to be covered.
- This coverage continues to expand as Signatories ratify and new Signatories join the BEPS MLI.

Overall, at this stage more than 90% of the tax treaties concluded between members of the Inclusive Framework are either compliant with the minimum standard, subject to a complying instrument, or subject to steps taken by at least one treaty partner to implement the minimum standard.

Action 13 – Country-by-Country reporting

Action 13 requires all large multinationals to prepare a Country-by-Country (CbC) report with aggregate data on the global allocation of income, profit, taxes paid and economic activity in all tax jurisdictions in which it operates. The CbC report is then shared with qualifying tax administrations in these jurisdictions, for use in high level transfer pricing and BEPS risk assessments.

As a result of Action 13:

- 120 Inclusive Framework members have introduced legislation to require the filing of a CbC report, covering substantially all MNEs above the EUR 750 million threshold;
- More than 4 400 bilateral relationships have been established for the automatic exchange of CbC reports; and
- 80 Inclusive Framework members have completed all of the building blocks to enable them to be in a position to receive CbC reports on exchange.

The seventh annual peer review report of Action 13, which considers all aspects of implementation of the CbC Reporting minimum standard by 138 Inclusive Framework members as of 31 March 2024, was released in September 2024. This shows that, where a jurisdiction has legislation in place, the implementation of CbC Reporting has been largely consistent with the Action 13 minimum standard. In particular, since the previous peer review report was released in 2023, 19 jurisdictions have taken steps which followed one or more recommendations for improvements to their domestic legal and administrative framework, their exchange of information framework, or their controls over the appropriate use of CbC reports, enabling these recommendations to be removed.

The OECD has provided extensive support, including targeted multilateral workshops on technical issues, to developing countries in their implementation of the Action 13 minimum standard. In total, 28 developing countries now have CBC reporting fully in place,[13] including 11 that completed the steps to receive CbC reports since the *G20/OECD Roadmap on Developing Countries and International Taxation Update* of July 2023.[14]

Work is also underway to make sure that the information in CbC reports exchanged under Action 13 can be put to effective use, including through workshops, training events, risk assessment software, handbooks and guidance.

Action 14 – Mutual Agreement Procedure (MAP)

The purpose of the Action 14 minimum standard is to ensure that dispute resolution mechanisms in tax treaties are operating well, by assessing how members are preventing disputes, the availability and access to MAP, resolution of MAP cases and implementation of MAP agreements. Peer review under Action 14 aims to assess a jurisdiction's adherence to the minimum standard while also providing recommendations and guidance in relation to areas of concern, as well as ongoing assistance to jurisdictions to meet the standard. Jurisdictions with MAP experience have been peer reviewed since 2016 and are currently subject to a continuing full peer review once every four years and use these peer reviews to further refine their MAP policies and practices based on peer input, while jurisdictions with less experience have been subject to a simplified peer review only since 2022 and have been using them to develop policies, share information, and build capacity for future MAP cases with the support of the FTA MAP Forum.

As a result of Action 14:

- 82 jurisdictions have already undergone two stages of peer reviews. A full peer review process is currently underway to assess the progress achieved by 55 of these jurisdictions with meaningful MAP experience in meeting the Action 14 minimum standard.
- 60 jurisdictions with limited or no MAP experience have undergone or are currently undergoing a simplified peer review process, with reports for 20 jurisdictions already published. Another 25 jurisdictions are scheduled to undergo this simplified peer review process in the coming months. The simplified process aims to help these jurisdictions to set up a more robust MAP programme for a possible increase in cases in the future.

Jurisdictions also report statistics related to their tax certainty obligations under Action 14. Ongoing collection of information and statistics provides a clearer picture of implementation and ensures that information about each jurisdiction's MAP function is available in published information on MAP (e.g. MAP guidance or MAP profiles). Starting from 2024, jurisdictions have also provided statistics related to Advance Pricing Arrangements (APAs), allowing stakeholders greater insight into the functioning of dispute prevention mechanisms within a jurisdiction.

[13] Note that the definition of developing country for the purposes of this figure refers to both the DAC list (https://www.oecd.org/en/topics/sub-issues/oda-eligibility-and-conditions/dac-list-of-oda-recipients.html) and the World bank list (https://datahelpdesk.worldbank.org/knowledgebase/articles/906519-world-bank-country-and-lending-groups)

[14] OECD (2023), *G20/OECD Roadmap on Developing Countries and International Taxation Update 2023: OECD Report to the G20 Finance Ministers and Central Bank Governors*, OECD Publishing, Paris, https://doi.org/10.1787/4fc33451-en.

Transfer Pricing

The work on BEPS Actions 8-10 has resulted in substantial revisions to the OECD Transfer Pricing Guidelines ("TPG"). To ensure the consistency and coherence of the TPG, and to enhance tax certainty and transparency, the OECD has been publishing over the years regular updates to the Transfer Pricing Country Profiles,[15] which provide stakeholders with first-hand information on Inclusive Framework members' domestic transfer pricing frameworks. The information currently available shows that jurisdictions continue to use the arm's length principle as the internationally accepted cornerstone to allocate profits among jurisdictions, with almost 80% of Inclusive Framework members having the arm's length principle as part of their legal framework. Furthermore, data show that approximately 70% of Inclusive Framework members rely on the TPGs as a source of interpretation of their domestic transfer pricing provisions, including the transfer pricing guidance developed under BEPS Actions 8-10. The 2025 update of the transfer pricing country profiles was launched in January with the goal of increasing the coverage of the transfer pricing country profiles and to incorporate additional information on Amount B.

Tax and Inequality

"With full respect to tax sovereignty, we will seek to engage cooperatively to ensure that ultra-high-net-worth individuals are effectively taxed. Cooperation could involve exchanging best practices, encouraging debates around tax principles, and devising anti-avoidance mechanisms, including addressing potentially harmful tax practices. We look forward to continuing to discuss these issues in the G20 and other relevant forums, counting on the technical inputs of relevant international organizations, academia, and experts. We encourage the Inclusive Framework on BEPS to consider working on these issues in the context of effective progressive tax policies."

THE RIO DE JANEIRO G20 MINISTERIAL DECLARATION
ON INTERNATIONAL TAX COOPERATION
July 2024

Building on the encouragement expressed in the G20 Rio de Janeiro Leaders' Declaration[16] for the Inclusive Framework to pursue work on tax and inequality, we will be discussing potential avenues for future work at the Inclusive Framework plenary meeting in April to explore the intersection of tax policy, inequality and growth. Future work on this topic would follow a phased evidence-based approach, beginning with a diagnosis of the key issues and the scoping of the initiative. Such a project could foster mutual learning, encourage best practice sharing, and identify potential opportunities and appetite for further international collaboration or coordination.

In connection with the invitation to the Inclusive Framework, the South African G20 Presidency has requested a scoping report on taxation and inequality from the OECD. The OECD Secretariat is developing this report, leveraging its expertise and insights from discussions at recent and forthcoming Inclusive Framework meetings.

[15] https://www.oecd.org/en/topics/sub-issues/transfer-pricing/transfer-pricing-country-profiles.html.

[16] https://www.gov.br/planalto/pt-br/media/18-11-2024-declaracao-de-lideres-g20.pdf.

Data gathering and analytical work of relevance to the internation of tax policy, inequality and growth is also progressing. A recent paper on capital gains taxation[17] examines country-level practices, explores the rationale and implications of differing tax treatments for capital gains compared with other income types, as well as the pros and cons of alternative approaches to taxing capital gains. Additional ongoing work includes taxation and informality, financing for social protection, and further work on the link between tax policy and growth.

Tax Certainty

As cross-border business and international labour mobility continues to be commonplace in a 21st century global economy, disputes relating to which jurisdictions can tax what types of income inevitably arise on occasion. Maintaining and enhancing tax certainty benefits taxpayers and tax administrations alike and is key in promoting investment, jobs and growth.

The work on tax certainty approaches the topic holistically, focusing on three key areas: simplification, dispute prevention, and dispute resolution. Simplification is the first and most fundamental goal, aiming to streamline rules and their administration to reduce complexity and enhance clarity for both taxpayers and tax administrations. This includes considering measures like safe harbours and other simplifications, such as the simplified and streamlined approach under Amount B. However, since simplification alone cannot address all challenges, the next focus is dispute prevention. This workstream includes tools and programmes designed to tackle potential issues in advance and offer taxpayers proactive avenues for early tax certainty, such as co-operative compliance programmes, coordinated risk assessments, bilateral and multilateral APAs, and joint or coordinated audits. When disputes cannot be prevented, the final focus is dispute resolution, which offers efficient, effective, and timely resolution mechanisms, including the MAP and arbitration. This integrated approach ensures that the tax certainty agenda not only promotes the prevention and resolution of disputes but also provides a clear and predictable framework of tax rules and administration for taxpayers.

Tax certainty also continues to be a central focus of the Forum on Tax Administration (FTA), with a key outcome from the 2024 Plenary being the development of practical approaches to enhance the current tax certainty and compliance framework for large businesses. This includes a focus on moving from dispute resolution to early dispute prevention, based on insights from tax administrations and business, identifying the factors most commonly leading to MAP cases and exploring best practices to avoid adjustments that have been systemically resolved at the MAP stage. As part of this effort, the FTA will also promote the use of APAs, where appropriate, building on the inaugural publication of the APA statistics. Additionally, the FTA aims to strengthen the International Compliance Assurance Programme (ICAP) building on feedback received from Business at OECD and MNE groups that have participated in the programmes. This will include exploring how a next phase of ICAP or multilateral risk assessment could prevent potential disputes arising under the global minimum tax.

[17] Hourani, D. and S. Perret (2025), “Taxing capital gains: Country experiences and challenges”, OECD Taxation Working Papers, No. 72, OECD Publishing, Paris, https://doi.org/10.1787/9e33bd2b-en.

Digital Transformation

Over the past decade, tax administrations have made significant progress in taking their long-standing practices and making them digital. But new technologies are creating opportunities for taxation to become much simpler and less burdensome for taxpayers. The FTA is working on a set of ground-breaking collaborative projects to support this journey. This includes: practical projects on automating real-time information sharing between tax administrations, and between tax administrations and third parties; building a global evidence base of the cost and benefits of digitalisation projects, building on the recent update of the Inventory of Tax Technology Initiatives (ITTI), which contains data on technology implementation from over 100 administrations; developing a new pilot framework for the use and governance of artificial intelligence in tax administration; and deepening co-operation with regional tax organisation on supporting the development of digital transformation strategies.

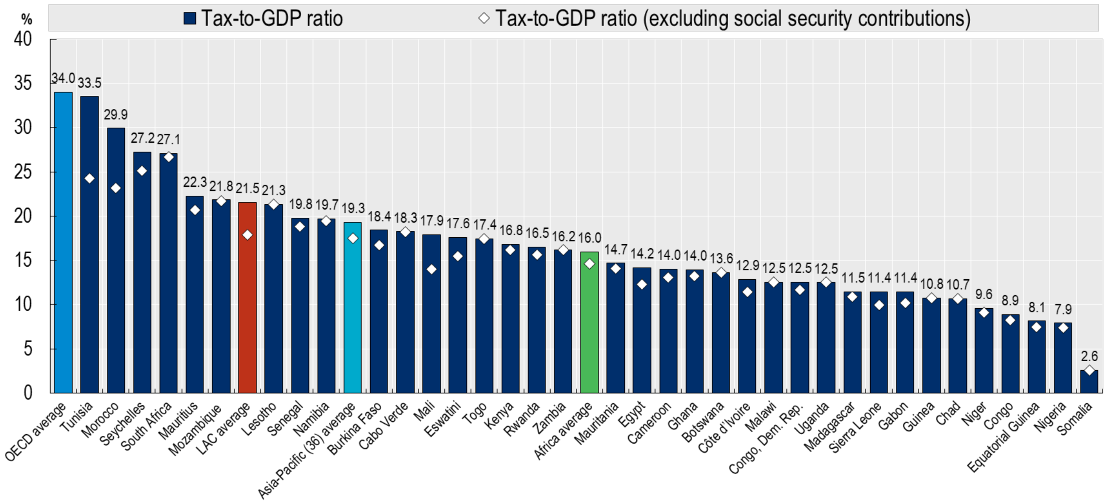
Tax Policy tools

The OECD's tax policy and statistics work combines observations from empirical work, theory and practical experience to provide insights into the effectiveness and efficiency of alternative tax policy choices, as well as to analyse their impact on broader policy considerations.

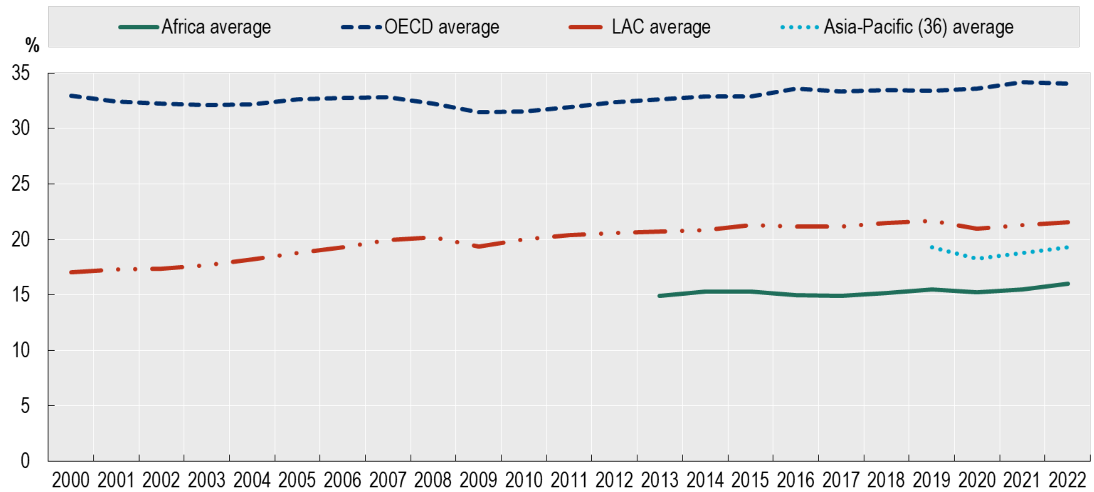
In December 2024, the OECD published the new edition of *Revenue Statistics in Africa*[18] in partnership with the African Union Commission and the African Tax Administration Forum. The report, which covers 36 African countries, shows that the average tax-to-GDP ratio for the continent was 16.0% in 2022, an increase of 0.5 percentage points from the previous year and above the level in 2019, prior to the COVID-19 pandemic. The increase was driven by higher revenues from corporate income tax on the back of higher profits from the extractive sector. However, average tax revenues in Africa in 2022 remained below the levels in Asia and the Pacific (19.3% of GDP), Latin America and the Caribbean (21.5%), and OECD countries (34.0%). Tax-to-GDP ratios varied widely across African countries, from 2.6% in Somalia to 33.5% in Tunisia; 19 of the 36 countries recorded a ratio below 15%. The new report also contains a chapter on how African countries can increase their revenue levels by promoting voluntary tax compliance, in particular through policies to facilitate tax payments and to increase trust in government among taxpayers.

[18] OECD/AUC/ATAF (2024), *Revenue Statistics in Africa 2024: Facilitation and Trust as Drivers of Voluntary Tax Compliance in Selected African Tax Administrations*, OECD Publishing, Paris, https://doi.org/10.1787/78e9af3a-en.

Total tax revenue (including & excluding social security contributions) as percentage of GDP, 2022



Average tax-to-GDP ratios by region, 2000-22



Tax and Development

Supporting the implementation of BEPS and the Two-Pillar Solution

Preventing BEPS is a high priority for developing countries, along with addressing the tax challenges arising from the digitalisation of the economy. In particular, support on the implementation of the Two-Pillar Solution has been provided throughout 2024. The OECD has delivered a range of multilateral and bilateral capacity-building activities in co-operation with international and regional partners, as well as developed e-learning resources to meet the demands of the developing international tax landscape:

- a total of 45 multilateral events reaching over 6 500 participants;
- bilateral engagement with 67 jurisdictions across all aspects of the Two-Pillar Solution;

- revised and updated jurisdiction-specific revenue estimates for 72 developing countries on Pillar Two's Global Minimum Tax; and
- five e-learning resources on the Two-Pillar Solution updated and published in Arabic, English, French and Spanish.

One of the lessons of the Pilot Programme is the importance of using small multilateral formats to build the foundation of knowledge. In November 2024, the OECD conducted a new series of multilateral, interactive workshops on key elements of the Two-Pillar Solution and economic impact assessment for a small group of countries.

At the same time, support for the implementation of the BEPS Action plan remains an important part of the OECD's offer on capacity-building, with a particular emphasis on the implementation of CbC Reporting under BEPS Action 13. This includes bilateral missions to accelerate and/or complement CbC Reporting implementation as well as regional events aimed at raising awareness. In November and December 2024, ad hoc missions were conducted in five developing countries. Efforts will continue to support all developing countries, including those well-positioned to implement the CbC Reporting standard in the short term.
Coordination and co-operation of all stakeholders will be essential to addressing these challenges and ensuring that developing countries can fully benefit from the implementation of these new standards.

Global Relations Programme

The Global Relations Programme on Taxation (GRP) delivers live training activities and self-paced learning tools to support tax officials in developing countries, covering a wide range of tax topics. In 2024, the GRP delivered 44 live training events, reaching over 5 500 officials worldwide, and significantly expanded its portfolio of self-paced tools by adding 3 new e-learning modules and 32 new recorded webinars, many of which are available in multiple languages. The GRP maximised the impact of these activities and resources by collaborating closely with partner countries (including through its network of Multilateral Tax Centres based in Austria, China, Hungary, Korea, Mexico, and Türkiye) and other international organisations. Notable examples include a practical workshop on the negotiation of tax treaties in Seoul, co-organised with the United Nations (UN), the Asian Development Bank (ADB) and Korea Tax Centre, and a blended learning cycle on Transfer Pricing in collaboration with the African Tax Administration Forum (ATAF). This cycle on transfer pricing effectively combined e-learning modules and live virtual classes and culminated with a face-to-face workshop in Pretoria, South Africa.

Capacity-building Support Related to the Extractive Sector

The OECD continues to support resource-rich developing countries with addressing BEPS related risks and challenges with a specific focus on the extractive sector. In December 2024, the OECD and the Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF) released a publication for public consultation: *Ring-Fencing Mining Income: A toolkit for tax administrators and policymakers*.[19] This toolkit, the publication of which is planned for the first half of 2025, is designed to support developing countries in addressing the tax policy and tax administration considerations related to the ring-fencing of mining income.

Tax Inspectors Without Borders

Tax Inspectors Without Borders (TIWB), a joint initiative of the OECD and the UNDP, has completed 91 programmes and is currently providing assistance in 66 programmes across all continents. 25 programmes were launched in 2024. Since its inception, TIWB assistance has helped tax administrations in developing countries generate an additional USD 2.30 billion in tax revenues and USD 6.05 billion in tax assessments across 88 jurisdictions in Africa, Asia and the Pacific, Eastern Europe, Latin America, and the Caribbean. Much of the success in Africa has been due to the partnership with the African Tax Administration Forum (ATAF). TIWB programmes adopt a customised approach to meeting the distinct needs of each tax administration across a wide range of areas. In addition to issues such as transfer pricing and the

[19] https://www.igfmining.org/wp-content/uploads/2024/11/igf-ring-fencing-draft-for-consultation-V6.pdf

reinforcement of criminal tax investigations (TIWB-CI), the initiative also spans the digitalisation of tax administrations and the effective use of automatic exchange of financial account information (AEOI), complementing the work of the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum).

Tax Morale

A new project has been launched examining the role of the fiscal contract between taxpayers and the state in Latin America, and how to improve it. This will bring together perceptions from taxpayers and tax administrations, together with a review of existing policies and practices by tax administrations that can help improve the fiscal contract. The first part of this project was launched in December 2024 in *Public Trust in Tax 2024: Latin America and Beyond*[20]*.* This report, produced in partnership with the International Federation of Accountants (IFAC) and the Association of Chartered Certified Accountants (ACCA), provides new data on public perceptions on tax from 16 Latin American countries, and five countries in Africa and Asia. It finds that while in theory there is support for the fiscal contract, and the use of taxation to support public goods, in many countries individuals do not see this being delivered in practice. This project builds on earlier OECD work on tax morale looking at individuals[21], taxpayer education[22], and the relationship between tax administrations and large businesses[23].

Capacity building for tax administration

Building a fair, efficient and resilient tax administration is critical for every jurisdiction. The FTA continues to support knowledge as part of a global tax administration community including opening up many of the virtual meetings of its informal networks to the members of Regional Tax Organisations. The FTA also prioritises support for the implementation of the Global Minimum Tax through its Pillar Knowledge Sharing Network, which brings together officials from more than 110 jurisdictions. Further assistance will also be given to developing countries to make use of the FTA's maturity models which can help to guide reforms across a range of tax administration functions. In addition, a new pilot programme will also be developed for senior-level peer-to-peer knowledge sharing on leadership challenges related to the transformation of tax administration.

Capacity Building for Ukrainian Judges

The OECD Secretariat has recently launched a new initiative in the context of the International Tax Capacity Building Programme for Ukraine, which aims at deepening the knowledge of Ukrainian administrative court judges in the application and interpretation of international tax rules, with a view to contributing towards enhanced tax certainty through more consistent judicial practices. An in-person workshop was hosted by the Supreme Administrative Court of the Czech Republic on 26-29 November 2024, and it was attended by 50 judges from Ukraine, which enabled intensive peer-to-peer discussions and experience sharing with the Czech Administrative Court Judges.

[20] OECD/IFAC/ACCA (2024), *Public Trust in Tax 2024 – Latin America and Beyond*, OECD Publishing, Paris, https://doi.org/10.1787/52ce48d5-en.

[21] OECD (2019), *Tax Morale: What Drives People and Businesses to Pay Tax?*, OECD Publishing, Paris, https://doi.org/10.1787/f3d8ea10-en.

[22] OECD (2021), *Building Tax Culture, Compliance and Citizenship: A Global Source Book on Taxpayer Education, Second Edition*, OECD Publishing, Paris, https://doi.org/10.1787/18585eb1-en.

[23] OECD (2022), *Tax Morale II: Building Trust between Tax Administrations and Large Businesses*, OECD Publishing, Paris, https://doi.org/10.1787/7587f25c-en.

Global Forum on Transparency and Exchange of Information for Tax Purposes

With 15 years of sustained efforts to promote transparency and international co-operation in the fight against tax evasion, the Global Forum on Transparency and Exchange of Information for Tax Purposes (Global Forum) continues to ensure a global level playing field. It focuses on implementing the Transparency and EOI Standards by all its members, while addressing new and emerging challenges.[24]

2024 Key figures on Tax Transparency Impact of the Global Forum's Activities

- More than **EUR 130 billion of additional revenues** (tax, interest, penalties) have been identified since 2009 thanks to voluntary disclosure programs and offshore tax investigations (over EUR 45 billion identified by developing countries).
- In 2023, information on **over 134 million financial accounts worldwide under the CRS**, covering total assets of almost **EUR 12 trillion**, was exchanged automatically.
- 125 jurisdictions reported making use of EOIR in 2023 and more than **28 900 requests** for information were made to support ongoing tax investigations.
- To date **127 jurisdictions have committed to implement the CRS and 65 have committed to implement the CARF**.
- **149** jurisdictions currently participate in the Multilateral Convention on Mutual Administrative Assistance in Tax matters (MAAC).

Celebrating 15 years of progress and agreeing on the future of Tax Transparency

On 26-28 November 2024, 400 delegates from more than 110 jurisdictions and 13 international bodies gathered in Asunción, Paraguay, for the 17th Global Forum Plenary meeting. They reflected on their collective achievements in the last 15 years, discussed emerging challenges and charted the future of the Global Forum.

This occasion was marked by a major advance on ensuring the widespread implementation of the recently developed Crypto-Asset Reporting Framework (CARF), as mandated by the G20. Furthermore, Global Forum members re-emphasised their commitment to further foster tax transparency, international tax co-operation, and the effective implementation of the EOI standards, building on their achievements on Exchange of Information on Request (EOIR) and Automatic Exchange of Information (AEOI), while supporting Global Forum members through capacity-building and outreach programmes.

[24] OECD (2024), *15 Years: Promoting Transparency and Co-operation – 2024 Global Forum Annual Report*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/global-forum-annual-report-2024.pdf.

Responding to the G20 call on the Crypto-Asset Reporting Framework

The CARF aims to address a key emerging risk to tax revenues and to transparency and exchange of information for tax purposes posed by the growing use of crypto-assets. Responding to a call from the G20 asking the Global Forum to ensure the widespread implementation of the CARF, the Global Forum finalised its CARF commitment process in advance of its 2024 Plenary meeting, including its criteria and process to identify jurisdictions relevant to the CARF (i.e. that have crypto-asset sectors that should be covered to ensure an effective CARF based on a level playing field) and the commonly expected implementation timelines.

To date, 65 jurisdictions have committed to implement the CARF in time to start exchanges by 2027 (54 jurisdictions) or 2028 (11 jurisdictions) at the latest.[25] Furthermore, 48 jurisdictions already began to implement their commitment by signing the CARF Multilateral Competent Authority Agreement on 26 November 2024. The Global Forum will continue to work to deliver on the request from the G20 to support the implementation of the CARF by relevant jurisdictions. The Global Forum will continue to identify and secure the commitments of any jurisdictions that become relevant to the CARF, as well as monitor the implementation of the commitments already made, including the introduction of the necessary domestic reporting frameworks on Reporting Crypto-Asset Service Providers (i.e. the service providers expected to collect and report information under the CARF).

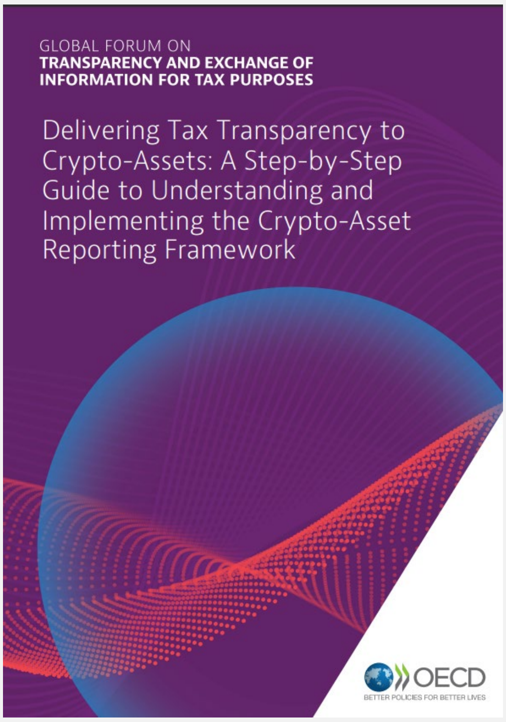
Another key deliverable of the Global Forum Plenary was the publication of a Step-by-Step Guide[26] to CARF implementation, which is intended to raise the awareness of jurisdictions and the private sector in relation to the steps that must be taken in order to implement the CARF on a consistent basis. The Step-by-Step Guide thereby serves as an important tool in assisting jurisdictions to implement the CARF.

[25] The status of the Global Forum's CARF commitment process can be found here, https://www.oecd.org/tax/transparency/documents/commitments-carf.pdf.

[26] OECD (2024), Delivering tax transparency to Crypto-Assets: A step-by-step guide to understanding and implementing the Crypto-Asset Reporting Framework, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/step-by-step-guide-understanding-implementing-crypto-asset-reporting-framework.pdf

New Step-by-Step Guide to Understanding and Implementing the CARF

The growth of the Crypto-Asset sector offers new business opportunities but poses certain risks to tax transparency due to the shift away from traditional financial intermediaries and the difficulty in tracking online activities. These risks have been identified as top concerns for tax transparency and anti-money laundering efforts, prompting the development of requirements for Reporting Crypto-Asset Service Providers.



Approved by the Global Forum on 9 November 2024, the *Step-by-Step Guide to Understanding and Implementing the CARF* encourages jurisdictions to commit to implementing the CARF to ensure its widespread adoption. It supports ongoing implementation by raising awareness among jurisdictions and the private sector about the commitment process and the necessary steps to meet the requirements of the CARF.

While each jurisdiction's approach will vary, based on its individual circumstances, implementing the CARF requires several key building blocks. Consistency in CARF implementation is essential to ensure the CARF is effective and to deliver a level playing field across jurisdictions and the crypto asset sector.

Continued progress on AEOI of financial account information, including a drive to the amended CRS

At its 2024 Plenary Meeting, Global Forum members highlighted the importance of expanding and strengthening the implementation of the AEOI standard for financial account information (the Common Reporting Standard, or CRS). This included welcoming new commitments to implement the CRS, bringing the total number of committed jurisdictions to 127 and the publication of new peer review results. The benefits of the second round of AEOI effectiveness reviews was specifically emphasised, which come with enhanced expectations and which are increasing the collective knowledge of how best to ensure the CRS is effective in practice. With the aim of ensuring the most effective global implementation of the CRS and to provide time for the further dissemination of best practices, the period for the second round of reviews for the first 99 jurisdictions has been extended by one year, with the final results to be published in 2026.

Global Forum members implementing the CRS have also agreed to implement the amended CRS 2.0 to maximise the benefits of AEOI in relation to financial accounts. Exchanges under the amended CRS will commence in 2027, with appropriate transitional arrangements where needed. These amendments widen the scope of the CRS and improve its effectiveness and usability. To date, 51 Global Forum members have signed the Addendum to the CRS Multilateral Competent Authority Agreement (CRS MCAA), reflecting the amended CRS. The Global Forum will monitor the implementation of the amended CRS, including the introduction of the necessary domestic reporting frameworks on Reporting Financial Institutions.

Ensuring confidentiality and data safeguards

Recognising the rapidly evolving technological and cyber-security environments, the Global Forum agreed to continue its peer review work on confidentiality and data safeguards. It adopted an enhanced methodology for further assessments starting in 2025, including a new monitoring mechanism for cyber-security controls. Members also welcomed updates on the current round of assessments, with 80% completed for jurisdictions that initiated automatic exchanges in 2017 and 2018, and ongoing assessments for more recent jurisdictions.

Monitoring the implementation of the EOIR standard

The Global Forum made continuous progress in the transparency and exchange of information on request (EOIR) peer review programme, with 23 reports published in 2024, including full assessments for 19 jurisdictions, legal framework reviews for 3 jurisdictions with limited EOIR experience and one supplementary full assessment report. Since October 2024, nine new peer review reports were published.[27]

Starting in the 2025, the Enhanced Monitoring Process for the EOIR standard includes a diverse assessment panel and new questionnaires for peer input and self-assessment. The progress of jurisdictions reviewed in the second round will be monitored, with annual reports published at the end of each year.

Assisting Global Forum members through capacity building

Initiated in 2011 in response to the increasing representation of developing countries within its membership, the Global Forum's capacity-building programme has progressively expanded to encompass a broad range of activities. Its multifaceted initiatives support jurisdictions worldwide in combating tax evasion and other illicit financial flows, thereby enhancing their domestic resource mobilisation. Since 2009, developing countries have collectively identified at least **EUR 45 billion** (out of a total of EUR 130 billion globally reported) in additional revenues through voluntary disclosure programmes and offshore tax investigations. These achievements result from years of awareness-raising and capacity-building activities supporting the implementation of tax transparency standards and fostering effective administrative co-operation.

The regional approach to capacity building remains a robust tool for sharing experiences, spreading the benefits of these standards and addressing the specific needs of the region. In 2024, region-specific activities have deepened and widened due to increased maturity and participation. Developing countries, representing 56% of the membership, have significantly contributed to the Global Forum's bodies and processes, including peer review processes, policy development, and the sharing of valuable expertise in implementing the standards.

To meet the growing needs of its members, especially developing countries, the Global Forum has achieved significant milestones in 2024:

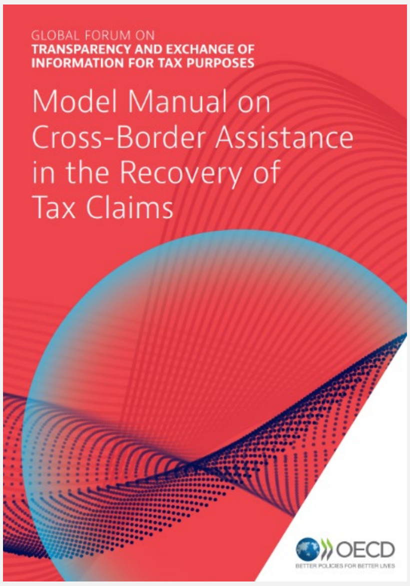
- **Bilateral technical assistance**: The Global Forum provided bilateral technical assistance to 100 jurisdictions, with intensive support to 79 developing countries. This marks the highest number of jurisdictions supported since the programme's inception in 2011.

[27] Overall ratings were issued for six jurisdictions, varying from “Compliant” for Azerbaijan, to “Largely Compliant” for Bosnia and Herzegovina, Colombia, Senegal and Uganda, and “Partially Compliant” for Montenegro. The remaining three reports are limited to an assessment of the legal and regulatory framework for Grenada, Guyana and Rwanda, which have limited practice of EOIR. Their frameworks were determined to be sufficient to move to the second phase of the review process, on the implementation in practice, due to take place in 2027, at the latest.

- **AEOI implementation**: Since the Strategy to unleash the potential of AEOI for developing countries was proposed in 2021,[28] there has been a tangible increase in committed jurisdictions. As a result, 56% of the developing members are now implementing AEOI in relation to financial accounts. Additionally, Georgia, Moldova, and Ukraine began their first automatic exchanges in relation to financial accounts by the end of 2024, bringing the total number of developing countries currently exchanging financial account information automatically to 37.
- **Crypto-Asset Reporting Framework (CARF)**: A Capacity-Building Strategy to support the widespread and effective implementation of the CARF[29] was released in 2024.
- **Preliminary Maturity Assessment Initiative**: Implemented in 2024, this large-scale initiative offered to 38 developing country members not yet engaged in AEOI has shown that the implementation of AEOI by developing countries is achievable in the short to medium term with appropriate technical support and political back-up. It has enhanced awareness of information security management and informed countries' decisions on when to join the AEOI standards.
- **Administrative Compliance Strategy Programme**: Launched in 2023, this programme aims to foster the effectiveness of CRS implementation. Significant progress has been made, with 75% of the 21 initiatives completed.
- **Training and capacity building**: In 2024, over 10 100 officials were trained through various programmes. This includes 5 664 officials trained in events led by the Secretariat, 1 614 officials through e-learning courses, and 2 832 officials through the Train the Trainer programme.
- **Information requests**: Developing countries sent more than 3 200 requests for information to support their tax investigations in 2023, an increase of more than 18% compared to 2 700 requests in 2022.
- **Knowledge tools**: The development of knowledge tools remains a crucial part of the capacity-building programme and the Secretariat launched 35 of these tools since 2011. These tools help build local knowledge and skills and are integrated into bilateral technical assistance activities to facilitate the implementation and use of tax transparency standards.

[28] OECD (2021), *Unleashing the potential of automatic exchange of information for developing countries, 2021 Strategy*, www.oecd.org/tax/transparency/documents/aeoi-strategy-developing-countries.pdf.

[29] OECD (2024), *Capacity-Building Strategy for the Widespread and Effective Implementation of the Crypto-Asset Reporting Framework*, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://www.oecd.org/tax/transparency/documents/capacity-building-strategy-implementation-crypto-asset-reporting-framework.pdf.



New Manual Cross-border Assistance in the Recovery of Tax Claims

On 6 November 2024, the Global Forum, working with African countries and with the support of partners and donor countries, successfully launched a new Model Manual on Cross-border Assistance in the Recovery of Tax Claims,[30] during a virtual event attended by 206 participants from 56 jurisdictions.

Recovering tax claims is a critical step in the taxation cycle, but tax authorities face challenges, especially in cross-border contexts where their powers are limited to national borders. This makes it difficult to collect taxes from debtors with assets abroad. Cross-border assistance in tax recovery allows tax authorities to help each other ensure all outstanding tax claims are recovered, regardless of the location of the debtors or their assets or revenues. Many jurisdictions, particularly in Africa, are interested in this form of tax co-operation, which complements and is supported by exchange of information, but need to establish the necessary functions and streamline their processes for effective participation.

The Model Manual provides practical guidance on the processes and procedures necessary for effective participation in cross-border assistance in tax recoveries. It builds on the Toolkit for Establishing a Function for Cross-border Assistance in the Recovery of Tax Claims[31], which was launched in July 2023 under the framework of the Africa Initiative.

The capacity-building programme has had a positive impact, with flagship initiatives such as the *Train the Trainer programme*, which has enabled 67 jurisdictions to develop a local and sustainable training expertise and to train over 9 100 tax officers in EOIR through 275 local trainings since 2021. The third edition of the *Women Leaders in Tax Transparency programme* was completed by 28 women from developing jurisdictions' tax administrations or ministries of finance. Additionally, the *Information Security Management Network* has over 325 officials from 85 jurisdictions sharing experiences and best practices.

Progress has also been made under regional initiatives in Africa, Asia, Latin America, and the Pacific, with growing support for Caribbean jurisdictions.

[30] OECD (2024), Model Manual on Cross-Border Assistance in the Recovery of Tax Claims, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, www.oecd.org/tax/transparency/documents/model-manual-cross-border-assistance-recovery-tax-claims.pdf.

[31] OECD (2023), A Toolkit for Establishing a Function for Cross-Border Assistance in the Recovery of Tax Claims, Global Forum on Transparency and Exchange of Information for Tax Purposes, OECD, Paris, https://web-archive.oecd.org/tax/transparency/documents/a-toolkit-for-establishing-a-function-for-cross-border-assistance-in-the-recovery-of-tax-claims.pdf.

17th Global Forum Plenary Meeting, 26-28 November 2024, Asunción, Paraguay

OECD Secretary-General Tax Report to G20 Finance Ministers and Central Bank Governors

G20 South Africa, February 2025

This report sets out recent developments in international tax co-operation, including the OECD's support of G20 priorities such as the implementation of the BEPS minimum standards, the Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy, and tax transparency, as well as updates on initiatives to enhance tax certainty, and tax administration. This report was prepared by the OECD ahead of the first meeting of G20 Finance Ministers and Central Bank Governors under the South African G20 Presidency, held on 26-27 February 2025 in Cape Town, South Africa.

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