

Pillar Two: Are you ready for compliance?

Understanding the rules, calculations and
what they mean in practice

8:00 a.m. to 1:00 p.m.

15 July 2026

AICB Centre of Excellence, Kuala Lumpur



The better the question.
The better the answer.
The better the world works.



Shape the future
with confidence



Pillar Two: Are you ready for compliance?

The Base Erosion and Profit Shifting (BEPS) Pillar Two rules introduce a global minimum tax regime that significantly changes how multinational enterprise (MNE) groups determine and report their tax outcomes.

While awareness has increased, many organizations do not have clear answers to some critical questions:

- Have you identified the correct entities in scope?
- Do you know your group's exposure and how it is determined?
- Are you assuming you qualify for Safe Harbor or have you tested it?
- If your headquarters requested Pillar Two information today, would your team be ready to respond?
- If asked today, can your team explain its role in the Pillar Two compliance process?

There is a common misconception that compliance is still some distance away. While filing deadlines may be later, preparation is required much earlier than expected.

This four-hour workshop provides a clear and structured walkthrough of how and when top-up tax arises, the structure of the Global Anti-Base Erosion (GloBE) computation framework and the application of the Transitional Safe Harbor.

The session will also cover the key compliance obligations and the role of Malaysian entities within the broader group framework, highlighting common readiness gaps and how organizations should begin preparing in a structured and practical way.

Participants will leave with a clearer understanding of how the rules apply to them, what is expected from their teams and how to approach Pillar Two readiness with confidence.

Learning outcomes

- Understand the scope and core structure of the Pillar Two rules.
- Explain how and when top-up tax is triggered.
- Understand the Pillar Two computation framework, including the role of GloBE Income and Adjusted Covered Taxes.
- Apply the Transitional Country-by-Country Reporting (CbCR) Safe Harbor tests in practice.
- Identify the key filing obligations, reporting requirements and timelines.
- Understand the role of Malaysian entities within the group compliance framework.
- Recognize common readiness gaps and challenges.
- Determine practical next steps to begin preparing for Pillar Two compliance.

Who should attend?

- Country heads, regional and country managers / heads.
- Chief financial officers (CFOs) and finance leaders.
- Tax directors, heads of tax and tax managers.
- Finance controllers, directors and managers.

Agenda

Time	Event details
8:00 a.m.	Registration
8:30 a.m.	Welcome remarks and introduction
8:45 a.m.	Module 1: Pillar Two fundamentals <ul style="list-style-type: none">▪ Scope of application.▪ How the Pillar Two rules operate.▪ Identification of Malaysian constituent entities.▪ Tax charging mechanisms and Malaysia's Qualified Domestic Minimum Top-up Tax (QDMTT).
9:30 a.m.	Module 2: Pillar Two computation framework <ul style="list-style-type: none">▪ Structure of the GloBE top-up tax calculation.▪ Concept of GloBE Income and Adjusted Covered Taxes.▪ QDMTT "allocation" rules.▪ Drivers of low effective tax rate (ETR) outcomes.▪ Additional technical complexities within the rules.
10:30 a.m.	<i>Break and networking</i>
10:45 a.m.	Module 3: Transitional CbCR Safe Harbor <ul style="list-style-type: none">▪ Purpose and effect of the Safe Harbor.▪ How to perform the three Safe Harbor tests.▪ Qualified CbCR conditions.▪ Key limitations and disqualification risks.
11:45 a.m.	Module 4: Compliance framework and filing obligations <ul style="list-style-type: none">▪ GloBE Information Return (GIR).▪ Top-up tax returns and local filing requirements.▪ How the GIR and tax returns interact.▪ Centralized vs. local GIR filing.▪ Key filing timelines.
12:15 p.m.	Module 5: Practical application for Malaysian entities <ul style="list-style-type: none">▪ Role of Malaysian entities in Pillar Two compliance.▪ Coordination with headquarters and internal responsibilities.▪ Common readiness gaps and challenges.▪ Practical way forward and next steps.
12:45 p.m.	Q&A
1:00 p.m.	End <i>Lunch</i>

Speaker profiles



Farah Rosley

Malaysia Tax Managing Partner,

Ernst & Young Tax Consultants Sdn. Bhd.

Farah has more than 25 years of experience handling tax consulting and advisory matters including tax structuring, tax reviews, incentives, tax audits and investigations, and transfer pricing assignments, covering a range of industry sectors.

She is a frequent speaker at national and international conferences. Farah works closely with government authorities and agencies on various taxation matters for local and multinational corporations (MNCs). She is involved in government consultation meetings and has been invited to participate in a task force on tax policy matters.

Qualifications:

- Bachelor of Science (Hons) in Accounting and Finance, University of Hull, United Kingdom
- Licensed tax agent, Ministry of Finance, Malaysia
- Fellow and Chartered Accountant, Association of Chartered Certified Accountants (ACCA)
- Chartered Accountant, Malaysian Institute of Accountants (MIA)
- Fellow, Chartered Tax Institute of Malaysia (CTIM)



Andrew Loh

Partner, International Tax and Transaction Services,

Ernst & Young Tax Consultants Sdn. Bhd.

Andrew Loh is a Partner in the International Tax and Transaction Services practice with over 18 years of experience across Malaysia, the UK and the US, including time with the EY Global Tax Desk in New York. He also leads the ASEAN BEPS 2.0 Center of Excellence (COE), driving regional thought leadership and technical guidance on Pillar Two implementation.

Andrew works closely with MNEs on Pillar Two impact assessments, top-up tax modeling and implementation, including data readiness, provisioning and planning opportunities. He also co-leads the EY Pillar Two practice in Malaysia, supporting clients on training and end-to-end implementation.

Qualifications:

- Bachelor of Science (Hons) in Economics, London School of Economics and Political Science



Janelle Lim

Partner, Global Compliance and Reporting,

Ernst & Young Tax Consultants Sdn. Bhd.

Janelle is a distinguished Partner in the Tax practice of EY in Malaysia, experienced in corporate tax matters. With over 20 years of extensive experience in professional services, she excels in managing corporate income tax compliance and advisory services.

Her diverse portfolio encompasses a wide array of industries, including telecommunications, investment holding, manufacturing, logistics, trading, services, plantations, property development and construction companies across Malaysia.

Qualifications:

- Bachelor of Business Administration (Hons) in Finance, Universiti Tenaga Nasional, Malaysia

Speaker profiles



Venkataraman Ganesan

Associate Partner,
Global Compliance and
Reporting,

Ernst & Young Tax
Consultants Sdn. Bhd.

Venkat has more than 20 years of experience in international tax and transfer pricing across both consulting and industry. Prior to joining EY, he led the transfer pricing team in a national oil and gas firm and contributed to the development of a tax technology ecosystem to support the global implementation of the OECD BEPS 2.0 Pillar Two framework.

Earlier in his career, Venkat worked in India and Malaysia, advising on transfer pricing matters including planning, controversy management, profit attribution and structuring. He has also supported dispute resolution engagements, including unilateral and bilateral advance pricing agreements (APAs) and mutual agreement procedures (MAPs).

Qualifications:

- Member, Institute of Chartered Accountants of India
- Bachelor of Law, Bangalore University, India



Ville Antikainen

Associate Partner, Tax
Technology and
Transformation,

Ernst & Young Tax
Consultants Sdn. Bhd.

Ville is an Associate Partner at EY, specializing in tax technology and transformation. He has international experience across consulting and in-house leadership roles, helping organizations enhance tax function efficiency through technology, automation and operating model transformation.

Ville has extensive experience across international tax, spanning transfer pricing, tax accounting, BEPS 2.0 Pillar Two, indirect taxes and tax risk management, as well as previously served as an in-house tax leader in a multinational ICT company. He works closely with multinational clients to strategize and deliver tax technology roadmaps, including various technology angles from enterprise resource planning (ERP) tax integration and data analytics to compliance automation and generative AI solutions.

Qualifications:

- Master of Science, Finance and Accounting, Aalto University, Finland



James Wong

Director, Global
Compliance and
Reporting,

Ernst & Young Tax
Consultants Sdn. Bhd.

James has over 10 years of professional experience in tax, specializing in corporate tax services. His experience includes providing tax accounting services (deferred tax computation and provisional tax computation) for statutory and Group Generally Accepted Accounting Principles (GAAP) reporting purposes based on accounting standards requirements. He is also involved in providing corporate tax compliance services for various corporate groups, public-listed companies and both Malaysian and non-Malaysian multinationals.

James is also involved in a series of corporate tax planning and tax advisory engagements relating to group restructuring exercises, corporate due diligence and Malaysian withholding tax advice for cross-border transactions. He has also supported clients in assessing the potential impact of BEPS 2.0 Pillar Two on their operations, as well as their tax accounting requirements under MFRS 112.

Qualifications:

- Bachelor of Commerce (Hons) Accounting, Universiti Tunku Abdul Rahman, Malaysia
- Member, Certified Practising Accountant Australia (CPA Australia)

Registration information

Registration fee	Fee (RM)
Standard rate	750.00
EY Tax Academy (EYTA) subscribers <i>Please visit https://www.ey.com/en_my/ey-tax-academy for details.</i>	450.00

HRD Corp training program number: 10001703260

Location	Date	Time	Enquiries	Registration link
Meeting Room 2.11, Level 2, AICB Centre of Excellence, Kuala Lumpur	15 July 2026	8:00 a.m. to 1:00 p.m.	Click here	Click here

Registration closes three working days before the event date or once all seats are taken.

Important notes:

- The registration fee stated above includes 8% Service Tax. Participants may submit questions in advance to seminar@my.ey.com.
- Please select the participant category carefully. No alterations are allowed after the registration has been made. HRD Corp claimable - subject to prior application to HRD Corp by employers/companies which contribute to the HRD Corp levy.
- Participants are entitled to:
 - One tea break and one lunch
 - CPE credit: 4
- Have a question or a specific issue you'd like to discuss? Please submit it to seminar@my.ey.com by 10 July 2025.

Disclaimer:

- This material has been prepared for general informational and educational purposes only and is not intended, and should not be relied upon, as accounting, tax, legal or other professional advice. Please refer to your advisors for specific advice.
- Neither the EY organization nor any of its member firm thereof shall bear any responsibility whatsoever for the content, accuracy, or security of any third-party websites that are either linked (by way of hyperlink or otherwise) or referred to in this presentation.
- The views of third parties set out in this webcast are not necessarily the views of the global EY organization or its member firms. Moreover, they should be seen in the context of the time they were made.

For HRD Corp applicants

HRD Corp training course number: 10001703260

- For grant application, please refer to the [HRDC employer guidelines](#).
- Please [email your grant approval code](mailto:seminar@my.ey.com) to seminar@my.ey.com by 10 July 2025 to confirm your participation.

HRD Corp grant application details:

- MyCoID: 179793K
- Training provider name: Ernst & Young Tax Consultants Sdn. Bhd.
- Course title : Pillar Two: Are you ready for compliance?
- Scheme name: SBL-Khas
- Type of training: Public
- Total training hours: 4.0
- Trainers (only need to insert one name from the list): Farah Rosley
- Level of certification: Certificate of attendance

HRD Corp accredited trainer profile



Farah Rosley
Malaysia Tax Managing Partner,
Ernst & Young Tax Consultants Sdn. Bhd.

Education

Bachelor of Science (Hons) in Accounting and Finance, University of Hull, United Kingdom

Memberships and affiliations

- Fellow and Chartered Accountant, Association of Chartered Certified Accountants (ACCA)
- Fellow and past president, Chartered Tax Institute of Malaysia (CTIM) – 2019 to 2022
- Chartered Accountant, Malaysian Institute of Accountants (MIA)
- Licensed tax agent under the Income Tax Act 1967 and registered with the Ministry of Finance, Malaysia

Professional background

- Farah has more than 20 years of experience in managing corporate tax engagements and working with large multinationals, public companies across a variety of sectors, including services, telecommunications, property development, construction and manufacturing. She has also advised on special government initiatives and studies on tax matters as well as lent insights into government policies for specific sectors.
- During her tenure as President of CTIM, Farah played an active and facilitative role in working with key government stakeholders and the private sector on leading-edge tax decisions and improvements for the nation.
- Farah is a firm believer in supporting the next generation of tax professionals and initiated the EY Young Tax Professional of the Year program in Malaysia in 2013 to create awareness of the tax profession and encourage the young to consider a career in tax.
- A regular speaker at national and international tax conferences and seminars, Farah has also authored numerous articles and commentaries for various publications.

Terms and conditions

Registration

- Registrations can only be made online. To register, please complete the online registration form and make payment promptly if HRD Corp grant does not apply to you.
- Please indicate in the registration form if the participant intends to claim the HRD Corp training grant. A maximum of nine participants from the same employer is permissible according to the HRD Corp guidelines.
- Registration fees are non-refundable upon confirmation. No refunds will be entertained for cancellations, withdrawals, or no shows on the day of the conference. A 20% fee will be imposed on no-show participants claiming under the HRD Corp training grant.
- Replacements are allowed. However, the details of the persons replacing the registered participants must be submitted at least two working days before the seminar date.
- An acknowledgement email will be issued upon registration followed by a confirmation email with an invoice as applicable.

Payment

Remittance information:

HSBC BANK MALAYSIA BERHAD
Account No. 30175181401
SWIFT HBMBMYKL

- If the participant is claiming the HRD Corp training grant, please provide the grant approval code at least one working day before the date of the event.

For enquiries

Email: seminar@my.ey.com

Other important information

- No part of the materials may be reproduced in any form, stored in a retrieval system, or transmitted by any means – electronically or mechanically, photocopied or recorded without the prior permission of the author or the organizers. Video and sound recording are strictly prohibited.
- All information contained in this brochure is correct and accurate at the time of publication. The organizers reserve the right to cancel, make amendments and changes to the program if warranted by circumstances beyond their control. The organizers shall not be responsible for any costs, damages or losses incurred by the participant due to changes or cancellation. They also reserve the right to make alternative arrangements without prior notice should it be necessary. By registering, you are deemed to have read and accepted the terms and conditions herein.

Attendance:

- a) Must register at the counter by 8:30 a.m. on the day of the seminar.
- b) The e-certificate of attendance will only be released to the registered participant with full attendance and full payment after the completion of the seminar.

EY | Building a better working world

EY is building a better working world by creating new value for clients, people, society and the planet, while building trust in capital markets.

Enabled by data, AI and advanced technology, EY teams help clients shape the future with confidence and develop answers for the most pressing issues of today and tomorrow.

EY teams work across a full spectrum of services in assurance, consulting, tax, strategy and transactions. Fueled by sector insights, a globally connected, multi-disciplinary network and diverse ecosystem partners, EY teams can provide services in more than 150 countries and territories.

All in to shape the future with confidence.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity. Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via ey.com/privacy. EY member firms do not practice law where prohibited by local laws. For more information about our organization, please visit ey.com.

© 2026 Ernst & Young Tax Consulting Sdn. Bhd.
All Rights Reserved.

APAC no. 07012201
ED None

This material has been prepared for general informational purposes only and is not intended to be relied upon as accounting, tax, legal or other professional advice. Please refer to your advisors for specific advice.

ey.com/my