Pillar Two – where are we now?

Date: Friday, 11 December 2026
Tim: 10:00 – 13:00
Venue: Online via Zoom
CPD: 3 hours

Time	Topics	Speakers
10:00 – 10:10	Introduction by Chair including a brief summary of the **history of the Pillar Two regime**	Cormac Golden, *KPMG*
10:10 – 11:00	**Lessons learned from Pillar Two filings in June 2026 (Part 1)** • Setting the scene - companies that were in scope and why • Tax registrations – QDTT, IIR and UTPR top-up taxes and forming groups • Tax returns that had to be filed - QDTT, IIR, UTPR, Notification of Filer and TIR • Pillar Two calculations required to prepare the tax returns - overview of the methodology	Dr Patrick Mulcahy, *EY*
11:00 – 11:10	**Stretch break**	

11:10 – 12:00	**Lessons learned from Pillar Two filings in June 2026 (Part 2)**
	• Issues that arose and how those issues were managed in practice e.g.:
	  ○ dormant entities, JVs; entities in liquidation and M&A activity
	  ○ TIR validation errors
	  ○ central filing and extended deadlines in other jurisdictions
	• Guidance and confirmations provided by Revenue
	• Insights and lessons learned
		Frances Lenihan, *Deloitte*

12:00 – 12:50	**Looking to the future** • Companies that will be in scope for the March 2027 pay and file deadline including full implementation of the UTPR • Impact of the Side-by-Side Package • Safe harbour provisions – how these will change over the coming years and what this means for groups • Continuing guidance • Challenges facing companies and their advisers in navigating the expanding scope of the Pillar Two regime	Paul McKenna, *PwC*
12:50 – 13:00	**Q&A**	**All speakers**

Speakers

Cormac Golden is a Director in KPMG's tax research and policy team, focusing in particular on EU, OECD and international tax initiatives. He has 12 years of experience in corporate tax and international tax since joining KPMG in 2014. Cormac is one of KPMG's leads for Pillar Two in Ireland. He has taken a leading role in drafting KPMG's responses to public consultations on Pillar Two and acts as a representative of the ITI and KPMG at Pillar Two stakeholder meetings with Revenue and the Department of Finance. Cormac has also spent time on secondment to KPMG's EU Tax Centre in the Netherlands and *Business at OECD* (BIAC) in Paris. Prior to joining KPMG's tax research and policy team, he worked in KPMG's financial services tax practice, specialising in aviation finance and leasing. He is an Associate of Chartered Accountants Ireland (ACA) and a Chartered Tax Adviser (CTA).

Frances Lenihan is a Tax Partner Deloitte and has over 15 years' experience specialising in corporate and international tax. Frances works with multinational companies and Irish PLCs on a range of international tax matters. Part of Deloitte Ireland's Pillar Two Leadership, she actively leads complex Pillar Two advisory and compliance engagements. The Irish tax Desk in Deloitte US was recently led by Frances, where she gained extensive experience on international tax matters. Her diverse client portfolio is across a range of industries with a particular focus on life sciences. Frances is a chartered Accountant (FCA) and a Chartered Tax Adviser (CTA).

Paul McKenna is a Director in PwC's Foreign Direct Investment team. He has 14 years of experience in corporate tax and international tax since joining PwC in 2012. Paul has advised US, Irish and other multinational companies across many areas including international cross border structuring, group reorganizations, IP planning and debt structuring. More recently Paul has led PwC's Pillar Two team in Ireland, navigating the complex compliance challenges and leading on the Pillar Two advisory engagements. He is a Chartered Tax Adviser (CTA) and represents the ITI and PwC at BEPS TALC and at the Pillar Two stakeholder meetings with Revenue and the Department of Finance.

Dr. Patrick Mulcahy is a Chartered Tax Adviser (CTA), a Chartered Accountant (FCA). He currently lectures for the Irish Tax Institute and at Dublin City University (DCU). Patrick is Editor of Volume 1, *Irish Taxation: Law and Practice*, the Irish Tax Institute's leading third-level text. Patrick also specialises in Corporate Tax compliance within the Financial Services practice at EY Dublin.