

ICC Global Tax Commission

The 2025 Roadmap

*Reviewing 2024 and
spotlighting the year
ahead*



Contents

Introduction	3
1. Reviewing 2024	3
1.1. OECD Two Pillars Tax Reform and other tax policy areas	3
1.2. UN Tax Committee of Experts	3
1.3. UN Tax Resolution	4
1.4. EU Tax Policy Developments	5
1.5. Platform for Taxation in Latin America & the Caribbean (PTLAC)	6
1.6. BRITACOM	6
1.7. Events/Panels Organized in 2024	7
1.8. Media Coverage in 2024	7
2. Roadmap for 2025	8
2.1. OECD Global Tax Reform	8
2.2. UN Tax Committee of Experts	8
2.3. UN Tax Resolution	10
2.4 EU Tax Policy Developments	11
2.5. Platform for Taxation in Latin America and the Caribbean (PTLAC)	12
3. ICC Working Groups & other areas of work	12
Indirect Taxation	12
Taxation of Cross-border Teleworkers	12
Tax & Sustainability	13
International Tax Disputes Prevention & Resolution	13
4. Foreseen Reports/Publications for 2024	13
5. Tentative timeline/key dates	14

Introduction

2024 was indeed an intense year for international tax policy, marked by significant developments at the international level, particularly on the UN front. This includes both the UN Tax Committee of Experts and the more recent UN Tax Convention process.

The aim of this roadmap is to provide you with a quick overview of what happened in 2024, focusing on the engagements of our ICC Global Tax Commission. It also offers key dates, information, and opportunities to get involved in 2025.

For any questions or additional information, please do not hesitate to contact Luisa, ICC Global Lead on Taxation, at luisa.scarcella@iccwbo.org.

1. Reviewing 2024

1.1. OECD Two Pillars Tax Reform and other tax policy areas

In the context of the OECD Two-Pillar Tax Reform, the ICC Global Tax Commission has continued to engage with the OECD Secretariat and countries in various public and stakeholder meetings. The central focus regarding the Global Minimum Tax has been the request for Permanent Safe Harbours and the consistent implementation of the rules.

We have also responded to the public consultation on the [Draft User Guide for the GloBE Information Return XML Schema](#).

Throughout 2024, we participated in the stakeholders' day dedicated to the tax issues emerging from cross-border teleworking, where we advocated for a 60-day safe harbor that would allow employees to work remotely for a short period for personal reasons. In this context, we also prepared examples of cross-border short-term teleworking situations to share with the OECD.

Finally, during our ICC Global Tax Commission meetings, we invited Achim Pross (Deputy Director of OECD's Centre for Tax Policy and Administration (CTPA)) to our Spring and Autumn meetings to present the latest updates on the Two-Pillar solution.

1.2. UN Tax Committee of Experts

After the Spring session of the UN Tax Committee of Experts, we presented more comprehensive comments on Article XX regarding cross-border services, which was finally approved at the autumn session of the UN Tax Committee of Experts by a vote. [The ICC comments we presented have been published here.](#)

As the next steps, we are looking into commissioning an economic-impact assessment study on the trade and investment consequences of Article XX, examining both how this article could be implemented within tax treaties as well as through unilateral measures. We look forward to your support in relation to this report, which will be of key importance not only in the implementation phase of this new article but also in relation to the first of the two early protocols concerning the UN Tax Convention that relates to cross-border services and will start being negotiated in 2025.

An unexpected and concerning development has been the proposal (voted to be part of the UN model on first reading by the UN Tax Committee of Experts) on an extended provision to be added to Article 25 of the UN Tax Model. This new article would effectively absorb disputes on tax measures that are currently within the scope of investment and trade agreements under tax treaties. This proposal would, in effect, override investment and trade treaties, resulting in either tax dispute resolution mechanisms being applied or domestic tax courts deciding the matters. We have prepared an ICC submission highlighting the critical aspects of this proposal.

The cooperation between the UN Subcommittee on Indirect Taxation and our Indirect Tax Working Group has also positively continued, and our members have been invited to participate in their meetings to provide industry presentations that could be informative for the drafters of the reports and the members of the working group.

At the ICC Global Tax Commission meeting in October 2024, we also invited Mr. Michael Lennard (UNDESA) for an update on the work of the UN Tax Committee.

1.3. UN Tax Resolution

After Resolution 77/244, concerning the first resolution "Promotion of inclusive and effective international tax cooperation at the United Nations," was adopted in December 2022, the UN Secretariat report published in 2023. Resolution 78/230 was adopted in December 2023 through a vote. This resolution called for the formation of an intergovernmental ad-hoc committee to work on the Terms of Reference (ToRs) for a UN Framework Convention. The ToRs typically indicate how the future convention (and in the case of international tax cooperation, also two early protocols) will be negotiated, which topics they will address, and which objectives and modalities they will follow. The bureau of the ad-hoc committee was composed of 20 members, including a Chair, a rapporteur, and 18 vice-chairs representing the different UN regions equally. The ad-hoc committee met in February 2024 for a three-day organizational session where discussions took place on decision-making modalities (for this committee), the agenda for the substantive sessions, and stakeholder participation.

The organizational session was followed by two substantive sessions: one in [May 2024](#) and one in [July/August 2024](#). The ICC actively participated in both substantive sessions, calling for tax certainty, coordination, and consistency with existing frameworks to avoid fragmentation, the importance of consensus and the broadest buy-in from countries, and the fundamental role of business participation in the process. A zero-draft of the ToRs was published in June 2024 ahead of the second substantive session, to which we submitted a written response. Ahead of the second substantive session, we shared with delegations a paragraph specifically referring to business participation in future negotiations on the Convention and protocols texts. During the second substantive session of the negotiations ([General Statement](#)), we activated our network of national committees and coordinated joint participation and interventions. The national committees that were accredited/participating included ICC Mexico, ICC Pakistan, ICC Nigeria, ICC India, ICC UK, ICC Italy, and ICC US/USCIB. Ultimately, the final version of the ToRs included a paragraph encouraging stakeholder participation in future negotiations.

The ToRs also indicated that the topic of the first protocol to be negotiated together with the text of the Convention would be the taxation of cross-border services, highlighting the connection between the UN Tax Convention workstream and the UN Tax Committee work on Article XX. Due to this connection and the possible future influence of the UN Tax Committee work (adopted without any economic impact assessment study), commissioning an impact assessment study becomes incredibly important and relevant.

In August 2024, the committee adopted [the draft ToRs](#) for the framework convention. The ToRs were then subject to negotiations for their adoption under the 2nd Committee of the UN General Assembly, the 5th Committee of the General Assembly in relation to the budgetary implications, and the General Assembly plenary. As per UNGA procedure, the ToRs need to be adopted in the form of a resolution and first needed to be discussed and approved within the 2nd Committee of the UNGA, which deals with economic affairs. Within the 2nd Committee, the debate was mostly concerning the decision-making process, with the African countries not willing to move away from a simple majority, the majority of OECD countries wanting decisions to be taken via consensus, and a third possible option being discussed about an eventual qualified majority (2/3).

The ToRs could not reach consensus within the 2nd Committee and were adopted by vote. The ToRs call for the formation of another ad-hoc intergovernmental committee, tasked with the negotiation of the text of the Tax Framework Convention as well as two early protocols. Ultimately, the decision on decision-making for this committee has been postponed to the organizational session, where the topic of the second early protocol will also be taken into consideration.

After the vote at the 2nd Committee, the resolution was discussed by the 5th Committee in relation to the budget implications and finally voted on by the UNGA in a plenary meeting on December 24th. The vote mirrored the one in the 2nd Committee, with 9 votes against the text of the resolution, 119 in favor, and 43 abstaining. The Resolution is available [here](#).

1.4. EU Tax Policy Developments

In 2024, we submitted responses to the EU Commission public consultations relating to:

- [Cooperation on direct taxation - evaluation](#)
- [Tax paid by multinationals – template and electronic formats for ‘country by country’ reports](#)
- [Anti-tax Avoidance Directive \(ATAD\) – evaluation](#)

Documents can be found online on the EU Commission website as hyperlinked.

As ICC, we also participate to the meetings of the [EU Commission Platform for Tax Good Governance](#). In summer 2024 a new mandate of the Platform started, ICC participation was reconfirmed and the representatives for this new mandate are Vice-chair Rocio Bermudez, Vice-chair Thomas Quatrevalet (as first alternate) and Luisa Scarcella (ICC Secretariat, as third alternate).

Among the topics that have been discussed during these meetings:

- Business in Europe: Framework for Income Taxation (BEFIT) Proposal Package
- Decluttering

- The UN Resolution for a Framework Convention on International Tax Cooperation

In both our 2024 meetings, Mr. Angel (EU Commission Director for Direct Taxation, Tax Coordination, Economic Analysis, and Evaluation) provided ICC members with an update on the proposals currently being discussed and up for public consultation at the European level. The focus was particularly on decluttering, a topic on which we know the next mandate of the EU Commission for Tax Good Governance will concentrate. He also showed openness to considering permanent safe harbours in relation to the Pillar Two Directive and discussions within the OECD.

1.5. Platform for Taxation in Latin America & the Caribbean (PTLAC)

At the Ministerial Tax Summit in Cartagena, Colombia, held in late July 2023, finance ministers from 16 Latin American and Caribbean countries convened to establish a regional platform for discussing international taxation matters. The Ministerial Platform for Taxation in Latin America and the Caribbean serves as a platform to unify the region's stance on global tax policies, aiming to represent the interests of the region at both the OECD and UN levels. The signatories to date include Barbados, Bolivia, Brazil, Colombia, Chile, Ecuador, the Dominican Republic, Haiti, Panama, Paraguay, and Peru.

As a result of our advocacy efforts, the Summit also marked the establishment of a Private Sector Advisory Council within the platform, mirroring the one for Civil Society, to bring together the private sector voices in the region, which is coordinated by ICC.

In May 2024, reports from the following three working groups were presented and included the comments we received from our members active in the Private Sector Advisory Group:

1. **Progressivity in Taxation**
2. **Tax Incentives** (including the impact that Pillar Two will have on them)
3. **Environmental Taxation**

In the second part of 2024 and in the first half of 2025, the working groups have started to work on new reports in these three areas with more focus on mapping and collecting information on existing policies across the regions instead of new proposals. The working group on progressivity in taxation looking at wealth taxes is chaired by Chile, while the one on environmental taxation by Colombia and the one on Tax Incentives by the Dominican Republic. The working group on Tax Incentives is organizing a webinar on Pillar Two and Tax Incentives with the OECD on February 27th. If you would like to be added to the mailing list for the PTLAC Private Sector Advisory Council, please let us know.

1.6 BRITACOM

In September 2024, the annual conference of the Belt and Road Initiative for Tax Administrations Cooperation Mechanism took place in Hong Kong. As ICC, with the support of our previous Chair of the ICC Global Tax Commission, Christian Kaeser, we helped coordinate the Business Dialogue.

Should you be interested in the activities and next year's conference, please get in touch.

1.7 Events/Panels Organized in 2024

Date	Event	Location
February 2024	IFA Dialogue/ICC Disputes Resolution Mechanisms	Paris
March 2024	ICC Global Tax Commission Meeting	New York City, in occasion of the UN Tax Committee of Experts meetings session
12-14 June 2024	IFA European Region Conference	Lausanne, Switzerland
25-27 June 2024	IFA Latam Conference	Rio de Janeiro, Brazil
July 2024	ICC/BIAC/BusinessEurope Conference on International Taxation between Legacy and Revolution	Munich, Germany
24-26 September 2024	Business and Industry Tax Dialogue at the BRITACOM Annual Conference	Hong Kong
26 September 2024	MAP Day	Université de Lausanne
14 October 2024	ICC Global Tax Commission Meeting	UN Palais des Nations, Geneva. In occasion of the UN Tax Committee of Experts meetings session
25 – 31 October 2024	IFA Annual Congress (IFA/ICC/OECD Panel; UN Developments Panel, Doing Business in Africa)	Cape Town, South Africa
5-7 December 2024	Foundation for International Taxation FIT - Annual Taxation Conference 2024	Mumbai, India

1.8 Media Coverage in 2024

Our policy advocacy efforts have also received media attention and coverage in the course of 2024:

International Tax Notes:

[ICC Responds to OECD's Consultation on Information Return Scheme](#), 1 Aug. 2024

Bloomberg Tax:

[Business Group Troubled by Potential UN Model Treaty Change](#), 18 Oct. 2024

[Businesses Ask OECD for Simpler Minimum Tax Reporting Forms](#), 19 Aug. 2024

[UN Draft Tax Treaty Urges Fairer Taxing Rights, Wealth Taxes \(2\)](#), 7 June 2024

[UN Set to Work Out Details of Tax Treaty Amid Deep Divisions](#), 30 May 2024

[Rich Countries Warn of OECD Clash During UN Tax Treaty Talks \(1\)](#), 1 May 2024

[UN Group, Businesses Concerned Over Service Taxing Rights Reform](#), 20 March 2024

[Businesses Pan EU Tax Overhaul, Worry Over Clash With OECD Rules](#), 24 Jan. 2024

[UN Push for Greater Role in International Tax Talks](#), Explained, 26 Dec. 2024

2. Roadmap for 2025

2.1 OECD Global Tax Reform

Pillar One: We understand that the adoption of [Amount B](#) is still under consideration by many Inclusive Framework members as they take time to complete domestic administrative and legislative procedures along with other competing fiscal priorities in 2025/2026. Amount B is optional, and Inclusive Framework members are encouraged to provide sufficient notice to taxpayers in advance of Amount B coming into effect in their respective jurisdictions. To facilitate coordination, the OECD will maintain a list of countries that have officially confirmed they will adopt Amount B, including the date of adoption. This list will be maintained on the OECD website and regularly updated as jurisdictions begin to make those formal announcements. The OECD will hold a [technical webinar](#) on 11 February 2025 on the latest developments relating to Amount B, including a demonstration of the Pricing Automation Tool.

Pillar Two: Additional administrative guidance is expected to be released on other aspects of the reform as well. In 2025, it is our aim to continue engaging constructively with the OECD and capitals, advocating for:

- Consistency in the domestic implementation of Pillar Two,
- Transformation of the temporary Safe Harbors into permanent ones,

2.2 UN Tax Committee of Experts

The UN Tax Committee of Experts' current mandate will end in Spring 2025, with the last session focusing on approving and finalizing remaining open items (below you can find the latest version of the documents discussed and approved in October 2024). After this session, a new call for experts will be issued by the UN, and a new Committee will be formed and will initiate its work with the meeting taking place in Geneva in October 2025.

The dates for the UN Tax Committee's next two sessions are:

- 24 – 27 March 2025 – New York City (United States)
- 21 – 24 October 2025 – Geneva (Switzerland)

To learn more about the current proposals and topics currently being covered by the UN Subcommittees, we invite you to consult the latest reports hyperlinked to each subcommittee and topic listed below. Please do not hesitate to get in touch if you are interested in presenting observations on any of these topics. Please also be aware that with the new mandate, the subcommittees and working groups could change in terms of scope and areas covered.

Subcommittees	Latest version of the reports presented in October 2024
<u>UN Model Tax Convention between Developed and Developing Countries</u>	<ul style="list-style-type: none"> • E/C.18/2024/CRP28 – Co-coordinators' Report • E/C.18/2024/CRP29 – Article 8 • E/C.18/2024/CRP30 – Article 6 • E/C.18/2024/CRP31 – Natural Resources • E/C.18/2024/CRP32 – Insurance
<u>Transfer Pricing</u>	<ul style="list-style-type: none"> • E/C.18/2024/CRP24 – Co-coordinators' Report • Appendix A APA FAQs • Appendix B Pharmaceutical Industry
<u>Environmental Taxation Issues</u>	<ul style="list-style-type: none"> • E/C.18/2024/CRP33 – Co-coordinators' Report • Annex A – Phasing out fossil fuel subsidies, • Annex B – Potential responses to BCAs, • Annex C-1 Environmental taxation (other than carbon taxes), • Annex C-2 Inventory of select environmental taxes and other measures, • Annex D – Interactions between carbon taxation and mainstream taxes
<u>Taxation of the Digitalized and Globalized Economy</u>	E/C.18/2024/CRP22 – Co-coordinators' Report
<u>Increasing Tax Transparency</u>	E/C.18/2024/CRP37 – Co-coordinators' Report, Annex 1
<u>Health Taxes</u>	<ul style="list-style-type: none"> • E/C.18/2024/CRP34 – Co-Coordicators' Report • E/C.18/2024/CRP35 – Revised Chapters • E/C.18/2024/CRP36 – New Chapters • E/C.18/2024/CRP41 – Chapter 1
<u>Indirect Tax Issues</u>	<ul style="list-style-type: none"> • E/C.18/2024/CRP21 – Co-coordinators' Report • Annex A – Overview of VAT/GST in Developing Countries, • Annex B – VAT Small Enterprise, • Annex C – VAT/GST Refunds, • Annex D – New Technologies to improve VAT Compliance
<u>Extractive Industries</u>	<ul style="list-style-type: none"> • E/C.18/2024/CRP40 – Co-coordinators' Report • E/C.18/2024/CRP42 – Product Valuation • E/C.18/2024/CRP43 – Energy Transition • E/C.18/2024/CRP44 – Tax Incentives
<u>Dispute Avoidance and Resolution</u>	E/C.18/2024/CRP39 – Co-Coordicators' Report
<u>Digitalization and Improvement of Tax Administration</u>	<ul style="list-style-type: none"> • E/C.18/2024/CRP38 – Co-coordinators' Report • Annex 1 - Draft Outline, • Annex 2 - Legal Framework, • Annex3 - Part 4 Innovative Technologies, • Annex 4 - Part 3 Data Governance, • Annex 5 - Chapter 1, • Annex 6 - Chapter 2, • Annex 7 - Case Study
<u>Relationship of Tax, Trade and Investment Agreements</u>	E/C.18/2024/CRP23 – Coordinator's Report
<u>Wealth and Solidarity Taxes</u>	E/C.18/2024/CRP25 – Coordinator's Report, Appendix A

2.3 UN Tax Resolution

The first step will be the setup of an ad-hoc intergovernmental committee, similar to the one established at the beginning of 2024 to draft the Terms of Reference. The bureau of the committee will be composed of 20 members and representatives from different UN geographical regions. The committee is tasked, in its organizational session taking place in February, with deciding on decision-making processes, the topic of the second early protocol, the agenda, and other modalities and aspects, including stakeholders' participation. As included in the ToRs, the committee will meet up to three times a year for substantive negotiating sessions, in New York City and other cities such as Nairobi, where the UN has offices. The text of the Convention and early protocols will need to be finalized by autumn 2027.

Scope

In establishing the terms of reference for the UN Framework Convention on International Co-operation, the ad-hoc committee/General Assembly will be considering specific priority issues to be addressed through early protocols from a list of issues, namely;

- Taxation of income derived from cross-border services
- Tax-related illicit financial flows
- Taxation of the digitalised and globalised economy
- Prevention and resolution of tax disputes, and the taxation of high-net wealth individuals,

and in the longer term;

- Tax measures on environmental and climate challenges
- Exchange of information for tax purposes,
- Mutual administrative assistance in tax matters, and
- Harmful tax practices

The UN's Committee of Tax Experts has already made proposals under Article XX, not only for expanding or re-allocating taxing rights in respect of all cross-border services, but also for international shipping, aviation, and insurance. However, these proposals were pushed forward without full consensus among the committee members and without due consideration of industry representations or any analysis of the economic or commercial impacts. Accordingly, it will be vitally important that business views are heard if these proposals are to be adopted or duplicated in the protocols to come.

This is also why the **economic-impact assessment study on the trade and investment consequences of Article XX that we are commissioning is of critical importance**. We look forward to your support in relation to this report.

Equally, the OECD has been working to develop consensus-based proposals to address the challenges of the digital economy for more than a decade, and both the EU and OECD have long-established processes for dealing with harmful tax practices. Therefore, any change of direction without the support of the developed world would seem counter-intuitive.

Key business requests for action to prevent and resolve tax disputes have long been ignored, and ICC members do not accept that tax regulations requiring the adoption of arm's length transfer pricing standards (even if sometimes disputed) amount to 'illicit financial flows.' Thus, there is much work to be done in 2025 in considering the potential scope of the UN Framework Convention.

Key dates & Engagement

The dates and locations of the meetings for 2025 are still to be decided, and we will communicate those promptly to you. As ICC, we are going to participate in the organizational session (3-6 February 2025), and ahead of this session, we are sharing with delegates in New York and capitals our proposal for a Technical Business Sector Advisory Council.

If you are an ICC member, we have previously circulated and discussed this proposal ahead of and after the ICC Global Tax Commission Meeting that took place in October 2024. Should you not have received the proposal and would like to have it, please get in touch.

Besides this Council, which we hope UN member countries will take on board, we plan to organize business roundtables and updates throughout the negotiation sessions, as ICC typically does for other UN negotiation processes (e.g., COP with the Business and Industry NGOs (BINGO) updates we provide).

Ahead of the organizational session, we will also organize a short online update session on what to expect, followed by another short online session on the outcomes.

Please mark your calendar for the following dates:

3 February 2025, 8:30 EST / 2 pm CET

7 February 2025, 9 EST / 3 pm CET

We would like to remind you of the ICC UN Permanent Observer Status, which allows us to follow these negotiations closely, and we remain available for any questions you may have.

2.4 EU Tax Policy Developments

In relation to the EU tax policy developments, we will continue to closely monitor any developments in this area and constructively participate in the Platform for Tax Good Governance.

As we know, the main focus for the coming years will be on decluttering, and we have started working on the idea suggested by European ICC National Committees for a possible survey on decluttering with business recommendations for the EU Commission. However, we understand that members from non-EU national committees have expressed interest in this project, so we will broaden the scope of the project.

Regarding EU developments, we would also like to highlight a new working group on the EU Foreign Subsidy Regulation, which will start its work in January 2025. The first meeting will be on January 8th at 3 pm CET.

2.5 Platform for Taxation in Latin America and the Caribbean (PTLAC)

The Ministerial Platform for Taxation in Latin America and the Caribbean will be hosting its next meeting in May 2025 (location to be decided), and further communication will be transmitted to the members of the Private Sector Advisory Council. In the interim, we expect the three working groups to host sectorial meetings to prepare the reports that will be shared during the May meeting. In addition to those meetings, we would like to highlight the webinar taking place with the OECD on Tax Incentives and Pillar Two, on the 27th of February. If you or your Latin American colleagues are interested in being active in the Private Sector Advisory Council, please do not hesitate to contact us. We count on your contribution to keep running and managing the Private Sector Advisory Council.

3. ICC Working Groups & other areas of work

Indirect Taxation

The Indirect Tax Working Group meets every six weeks to discuss various policy developments in the area of indirect taxation at the OECD, UN, and EU levels, as well as at the national level. Working group meetings have also benefited in the past from presentations by colleagues from other ICC Commissions (e.g., Customs and Energy & Environment), as well as on VAT projects carried out by the WU University of Vienna. As we have just entered the new year, we expect to continue providing members of this working group with a platform to exchange and share knowledge on different and interrelated indirect tax matters.

The working group will also continue to actively and constructively engage with the work carried out by the UN Subcommittee on Indirect Taxation in their new mandate, including suggestions of possible topics of relevance for businesses. The working group is chaired by Joe Marden, and participation from other members of the ICC network is always welcome and encouraged. Please feel free to contact us for more information on how to join the working group and to learn about the dates of the next meeting.

Taxation of Cross-border Teleworkers

This working group, formed in 2022/2023, has actively engaged with different policy fora that recently started to work on these issues, both at the international (UN, OECD) and regional levels (EU, PTLAC). The working group has focused on short-term teleworking with the aim of informing policymakers about the tax challenges related to short-term cross-border teleworking and suggesting feasible and easily applicable solutions that can improve the current situation for employees and employers in the short term. The proposed short-term solution by the working group is a temporary **“Safe harbour”**, *a regulatory framework allowing a certain number of days in a foreign country [60] without triggering any tax/duties/levies, payroll, social security or related wage withholding registrations or liabilities, nor any reporting requirements.*

Tax & Sustainability

This working group was launched in 2024 to gather feedback on updating the 2018 ICC position paper on Tax & SDGs. The presentation of this updated position paper has been postponed to the 4th Financing for Development Conference (FfD4) taking place in Seville from June 30th to July 3rd 2025. The decision to postpone the release of the updated position paper was due to the importance given to domestic resource mobilization in the context of FfD4 linked to SDGs, making it an ideal moment to present the updated report.

The working group also represents an opportunity to explore more specific areas of work related to sustainability and ESGs in the future. Participation in the working group from other members of the ICC network is always welcome and encouraged. Feel free to contact us for more information on how to join the working group and to learn about the dates of the next meeting.

EU Foreign Subsidy Regulation

This is a new working group chaired by Yvonne Bertlin that will start meeting on January 8th, 2025, to work on a FAQ document to be shared later with the European Commission on the topic of EU Foreign Subsidy Regulation. The tax compliance challenges arising from this regulation were presented by Yvonne Bertlin (who chairs the ICC Sweden Tax Committee) at the last ICC Global Tax Commission meeting, where different members supported initiating work on this topic to raise awareness of the existing issues with policymakers and find possible solutions.

Participation in the working group from other members of the ICC network is always welcome and encouraged. Feel free to contact us for more information on how to join the working group.

International Tax Disputes Prevention & Resolution

While no formal working group has been set-up at the moment, in 2025, we will continue partnering with other organizations such as the International Fiscal Association and universities to share knowledge and advocate for the implementation of robust tax dispute prevention and resolution mechanisms.

4. Foreseen Reports/Publications for 2025

- **Report on Article XX – UN Tax Committee of Experts**
- **Updated Report on Tax & SDGs in Occasion of FfD4**

5. Tentative timeline/key dates

Date	Event	
15 January 2025	Feedback, views and comments on Elements Paper FfD4	Online
17 January 2025	Release of the Zero-Draft FfD4 Outcome Paper	NYC
22-23 January 2025	Presentation of the Zero-Draft FfD4 Outcome Paper to member countries	NYC
3-6 February 2025	Organizational session of the UN ad-hoc Intergovernmental Committee UN Tax Convention	NYC/Online
10-14 February 2025	3 rd Prepcom FfD4	NYC/Online
24-27 March 2025	30 th Session UN Tax Committee of Experts	NYC
28 March 2025	ECOSOC Tax Special Meeting	NYC
21 – 26 April 2025	IMF/WB Spring Meetings	Washington DC
28-29 April 2025	FfD Forum	NYC
30 April – 1 May 2025	4 th Prepcom FfD4	NYC/Online
May	Possible 1 st substantive session UN Tax Convention	NYC
30 June – 3 July 2025	FfD4 Conference	Seville (Spain)

About the International Chamber of Commerce

The International Chamber of Commerce (ICC) is the institutional representative of more than 45 million companies in over 170 countries. ICC's core mission is to make business work for everyone, every day, everywhere. Through a unique mix of advocacy, solutions and standard setting, we promote international trade, responsible business conduct and a global approach to regulation, in addition to providing market-leading dispute resolution services. Our members include many of the world's leading companies, SMEs, business associations and local chambers of commerce.

