



International Fiscal Association  
Malaysia Branch

## IFA Malaysia webinar

### Pillar Two as It Stands Today and the G7 “Side-by-Side” Approach

Date	10 September 2025
Time	3:00 – 4.00 pm (Kuala Lumpur)
Location	Online

The recent G7 Statement on 28 June 2025 announcing the adoption of a "side-by-side system" for US tax legislation has reshaped the global conversation on Pillar Two. Under the proposed “side-by-side” approach, US-parented multinational groups would be exempt from the Income Inclusion Rule (IIR) and the Undertaxed Profits Rule (UTPR) – a shift that could significantly alter the playing field for international tax.

Some see this as a pragmatic alignment with the US's existing minimum tax regimes; critics warn it could weaken the global minimum tax regime and create competitive imbalances for non-US groups. With implementation discussions now moving to the OECD/G20 Inclusive Framework, businesses face new uncertainty – and potentially, new opportunities.

Join our expert speakers for an in-depth discussion on:

- The current status of Pillar Two
- How the G7 proposal changes the global minimum tax landscape
- Implications for multinationals and tax policy globally
- What to watch out for as the OECD moves to translate political agreement into practical rules

*Get the context. Understand the implications. Stay ahead of the changes.*

Please register your attendance [here](#)

*This is a complimentary event.*

## Moderator

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**Aurobindo Ponniah**  
**Executive Director, PwC Malaysia**  
**IFA Malaysia Executive Committee Member**



Aurobindo is an Executive Director of PwC Malaysia, and has over 20 years' experience in tax consulting, research, training and documentation. He has worked extensively with tax authorities in the Asia-Pacific region and corporate organisations on various issues involving tax treaties, permanent establishments, financial instruments, cross border transactions, hybrid structures and anti-abuse provisions.

He is a member of CTIM and also a frequent speaker at seminars and conferences.

## Speakers

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**Doug McHoney**  
**PwC International Tax Services Global Leader**



Doug is PwC's International Tax Services (ITS) Global Leader and a Principal in the Washington National Tax Services group at PwC US. Currently his main focus is leading PwC's global Pillar Two offering, including the development and deployment of the Pillar Two Engine, PwC's centralized rules-based engine for compliance, provision and modeling.

Doug was formerly the national co-leader of PwC US' ITS practice – leading over 1,100 professionals – and the team leader for PwC US' Quantitative Solutions and Technology practice, working with large multinationals on complex modeling, deal structuring, reorganizations and business model transformations.

In all these roles he provides technology-enabled tax consulting services for acquisitions, dispositions, structuring of tax efficient business models, intellectual property planning, integrated foreign holding companies, and treasury management structures.

Doug is a frequent author and lecturer as well as a member of the Advisory Board for the International Tax Journal. Doug holds a Bachelor of Science in Accountancy and Juris Doctor from the University of Missouri-Columbia. He is a member of the American Bar Association (Taxation Section) as well as the bars of the State of Missouri and the State of Illinois.

Doug has over 20,000 followers across social media platforms and hosts the Doug McHoney channel on YouTube and the biweekly podcast "Cross-border Tax Talks."

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**John Peterson**  
**Head of Division, Centre for Tax Policy and Administration, OECD**



John Peterson is the Head of Division at Centre for Tax Policy and Administration (CTPA) at the OECD. He leads the teams responsible for Transfer Pricing, Taxation of the Digital Economy and Global Minimum Tax as well as the work undertaken by the Forum on Harmful Tax Practices. Prior to his current role he was Head of Unit at the OECD where he led the work on the design of the Global Minimum Tax and was responsible for drafting the Mandatory Disclosure of CRS Avoidance Arrangements and the rules on Neutralizing Hybrid and Branch Mismatch Arrangements.

Prior to joining the OECD, John was a tax partner at Minter Ellison Rudd Watts. John has an LLM from NYU and a BCL from Oxford University and has previously worked as a tax lawyer in New York, London and New Zealand.

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