International Tax News Flash

OECD announces new Pillar Two safe harbours

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In brief

On 5 January 2026, the OECD released a 'side-by-side package' (Package) under the Pillar Two global minimum tax rules[1]. The Package introduces four new safe harbours and provides a one-year extension of the transitional country-by-country reporting (CbCR) safe harbour as outlined below:

Safe harbour	Applicable fiscal years
Side-by-side (SbS) safe harbour	Fiscal years commencing in/after 2026
Ultimate parent entity (UPE) safe harbour	Fiscal years commencing in/after 2026
Simplified effective tax rate (ETR) safe harbour	Fiscal years commencing on/after 31 December 2026 (or fiscal years commencing on/after 31 December 2025 under certain circumstances)
Transitional CbCR safe harbour (one-year extension)	Fiscal years commencing on/before 31 December 2027 and ending on/before 30 June 2029
Substance-based tax incentive safe harbour	Fiscal years commencing in/after 2026

Separately, the OECD recently updated the list of jurisdictions that have obtained a transitional qualified status for their domestic global minimum tax legislation[2]. Notably, Hong Kong has obtained a transitional qualified status for its income inclusion rule (IIR) and Hong Kong minimum top-up tax (HKMTT), with the HKMTT also being eligible for the qualified domestic minimum top-up tax (QDMTT) safe harbour.

This news flash provides an overview of the Package and our observations thereon, including an analysis of the implications for in-scope multinational enterprise (MNE) groups with presence in Hong Kong. For a detailed discussion of the Package, please refer to the PwC Global Tax Policy Alerts[3].

In detail

The Package

Background

The Package follows the US withdrawal of support for Pillar Two one year ago, the advancement and subsequent removal of the proposed US retaliatory measure, and a June 2025 G7 agreement to pursue an SbS approach that accounts for US minimum tax rules. The stated aims of the Package are to preserve the benefits of the global minimum tax rules and provide greater certainty, stability and simplicity for in-scope MNE groups. The Package will be incorporated into the commentary to the global anti-base erosion (GloBE) model rules.

SbS safe harbour

This safe harbour allows in-scope MNE groups headquartered in qualifying jurisdictions a deemed top-up tax of zero under both the IIR and undertaxed profits rule (UTPR) with respect to all their constituent entities across all their domestic and foreign operations, including intermediate parent entities, partially-owned parent entities, minority-owned constituent entities, and interests in joint ventures (JVs) and JV subsidiaries (without affecting the top-up tax liabilities or obligations of the fellow JV partners).

The SbS safe harbour is available to in-scope MNE groups with a UPE located in a jurisdiction that has a qualified SbS regime listed in the OECD's central record[4]. A jurisdiction can qualify as having a qualified SbS regime if it:

(i) has an eligible domestic tax system (the key conditions are: a statutory nominal corporate income tax (CIT) rate of at least 20%; a QDMTT or corporate alternative minimum tax with a nominal rate of at least 15%; and no material risk that in-scope MNE groups headquartered in the jurisdiction will have an ETR below 15% on their overall domestic profits);

(ii) has an eligible worldwide tax system (the key conditions are: a comprehensive tax regime covering all resident corporations' foreign income, including both active and passive income of controlled foreign companies (CFCs), with limited exclusions; unilateral mechanisms to mitigate base erosion and profit shifting risks; and no material risk that in-scope MNE groups headquartered in the jurisdiction will be subject to an ETR below 15% on their overall foreign profits);

(iii) provides a foreign tax credit for QDMTTs on the same terms as any other creditable covered tax; and

(iv) has enacted its eligible domestic and worldwide tax systems prior to 1 January 2026. If the systems are enacted at a later date, its eligibility and timing of access to this safe harbour will be assessed by the OECD/G20 Inclusive Framework on BEPS (IF) during 2027 or 2028.

As of 5 January 2026, the US is the only jurisdiction identified in the OECD's central record as having a qualified SbS regime.

Observation: *While other jurisdictions may seek to demonstrate that they too have a qualified SbS* *regime, their ability to satisfy the stringent criteria remains uncertain, especially because the IF has not clarified how it will evaluate the more subjective aspects, such as the material risk of ETRs below 15%.*

The SbS safe harbour will take effect for fiscal years beginning on or after 1 January 2026. However, if a jurisdiction is unable to implement the safe harbour retrospectively from 1 January 2026 due to constitutional or other superior legal constraints, the jurisdiction is expected to collect only the portion of the UTPR top-up tax that corresponds to the amount it would have been allocated assuming the other UTPR jurisdictions, including those that have adopted the SbS safe harbour, have each fully collected their respective shares.

The SbS safe harbour does not affect the operation or application of QDMTTs. As such, in-scope MNE groups electing this safe harbour are still expected to remain fully subject to QDMTTs and fulfil the relevant compliance obligations going forward. QDMTTs will also continue to be calculated without a pushdown of CFC or other owner-level taxes, consistent with the guidance on the GloBE model rules.

Importantly, the SbS safe harbour does not relieve in-scope MNE groups from their obligation to file GloBE information returns (GIRs), though the compliance may be simplified as a result of electing this safe harbour. Furthermore, in-scope MNE groups remain subject to the full scope of the GloBE rules for fiscal years 2024 and 2025, including all related compliance obligations such as calculations, reporting and filings, even if such groups elect to use the SbS safe harbour in 2026 or later fiscal years.

Observation: *The Package specifically clarifies that the SbS safe harbour does not affect the application of a QDMTT. This reflects the OECD's recognition of the crucial role of QDMTTs in preserving the taxing rights of jurisdictions over low-taxed domestic profits where a QDMTT has been adopted.*

As the SbS safe harbour is intended to apply from 2026 onwards, US-headquartered MNE groups seeking to reduce their burden under the GloBE rules for fiscal years 2024 and 2025 will need to rely on the existing safe harbours, such as the transitional CbCR safe harbour or the transitional UTPR safe harbour.

The SbS safe harbour is accompanied by an agreement to perform ongoing monitoring and engage in a 'stocktake' process to be concluded in 2029. The stocktake is intended to assess the impact of the GloBE rules and the SbS safe harbour and to evaluate if any competitive imbalances or base erosion risks arise.

Observation: *The planned stocktake is not a 'sunset' or automatic expiration of the SbS safe harbour. Rather, it represents an agreement by IF members to review the operation and impact of both the GloBE rules and the SbS safe harbour by 2029, and to determine whether adjustments are warranted.*

UPE safe harbour

The UPE safe harbour is narrower than the SbS safe harbour in that it applies only with respect to the UPE jurisdiction and only with respect to the UTPR. It effectively replaces the transitional UTPR safe harbour, which expired at the end of 2025, and is available to in-scope MNE groups with a UPE located in a jurisdiction that has a qualified UPE regime listed in the OECD's central record.

For a tax regime to be a qualified UPE regime, it must meet the same criteria as an eligible domestic tax system under the SbS safe harbour. Unlike the SbS safe harbour which may also cover tax systems enacted at a later date, a qualified UPE regime under the UPE safe harbour must be enacted and effective as of 1 January 2026. Furthermore, a jurisdiction wishing to qualify must request review of its tax system, which will be performed by the IF during the first half of 2026. As with the SbS safe harbour, the UPE safe harbour will be subject to the same stocktake process described above. At present, no jurisdiction has been listed as having a qualified UPE regime.

Upon electing the UPE safe harbour, the in-scope MNE group's UTPR top-up tax with respect to all constituent entities located within the UPE jurisdiction is deemed zero for fiscal years commencing on or after 1 January 2026. The election applies only with respect to the UTPR and has no bearing on the application of IIR or UTPR to the group's operations outside the UPE jurisdiction, nor does it impact the operation of QDMTTs (including QDMTT in the UPE jurisdiction).

The GIR will be amended to allow in-scope MNE groups to elect the UPE safe harbour. Since the GIR already includes other necessary data points (such as identification of the UPE jurisdiction), MNE groups will not be required to provide any additional information to demonstrate their eligibility for the safe harbour.

Observation: *As US-headquartered MNE groups may elect to benefit from the broader SbS safe harbour, the UPE safe harbour appears more relevant for non-US-headquartered MNE groups. It remains to be seen whether any jurisdiction will be recognised as having a qualified UPE regime.*

It should also be noted that the eligibility conditions for the UPE safe harbour are more stringent than those for the transitional UTPR safe harbour. Accordingly, in-scope MNE groups currently relying on the UTPR safe harbour may not automatically qualify for the UPE safe harbour once it takes effect from 2026.

Simplified ETR safe harbour

Under this safe harbour, in-scope MNE groups may deem the top-up tax in a jurisdiction as zero if the jurisdiction's simplified ETR is at least 15%, or if the jurisdiction reports a simplified loss.

This safe harbour is intended to replace the transitional CbCR safe harbour (which is further explained below) and forms one of the permanent safe harbours for simplified calculations. It will apply to any fiscal year starting on/after 31 December 2026, or on/after 31 December 2025 if a jurisdiction chooses this option and specific conditions are met.

The simplified ETR is determined by dividing simplified taxes by simplified income (as defined), both calculated at the jurisdictional level. The computation relies primarily on financial accounting data from consolidated financial statements (CFS), reducing the need for complex tax-based adjustments when compared to the 'full' GloBE rules or domestic top-up tax (DMTT) regimes.

Certain jurisdictions will require the simplified ETR calculations to be made in accordance with the local financial accounting standard (LFAS) rather than relying on data from the group's CFS. This requirement is expected to mirror the LFAS rule applied for QDMTTs in those jurisdictions. Where LFAS jurisdictions allow taxpayers to elect to apply CFS, this election must be made consistently in all tested jurisdictions to the extent available and applied in each subsequent year for purposes of the calculation.

This safe harbour provides rules for the first election year and re-entry into the safe harbour. Broadly speaking, it is available for a jurisdiction if it had no top-up tax liability in that jurisdiction for the preceding 24 months.

Observation: *The simplified ETR safe harbour differs in several respects from the transitional CbCR safe harbour. It permits both entry and re-entry, rather than adopting a 'once out, always out' rule, and it does not use data points from a group's qualified country-by-country report.*

For the purposes of calculating the simplified ETR, the simplified income is calculated by adjusting the jurisdictional profit before income tax by the following adjustments:

- Basic adjustments:
  (i) Removing certain dividends and equity gains or losses; and
  (ii) Adding expenses accrued for bribes, kickbacks and other illegal payments as well as for fines and penalties that equal or exceed EUR 250,000;

- Industry adjustments for financial services or shipping industries;
- Conditional adjustments for certain income or expense items reported in other comprehensive income or equity;
- Optional adjustments such as elections related to asymmetric foreign exchange gain/loss and accrued pension expenses (as defined); and
- Special rules that provide simplified treatment for mergers and acquisitions and fair value election.

Similarly, the amount of simplified taxes is also calculated by making various adjustments to the sum of the jurisdictional current and deferred income tax expenses, including:

- Policy-based adjustments (e.g. non-covered taxes and refunds);
- Adjustments to align simplified taxes and simplified income (e.g. elimination of tax related to excluded income);
- Adjustments for uncertain taxes and taxes that are not payable promptly;
- Adjustments for deferred taxes (e.g. recasting to a 15% rate); and
- Specified optional adjustments.

The safe harbour provides a simplified five-year election for cross-border arrangements involving permanent establishments, hybrid entities or CFCs. This election allows related income and tax credits to be aligned within the same jurisdictional ETR computation, eliminating the need for complex inter-jurisdictional tax allocations. Furthermore, transfer pricing adjustments are streamlined. There are further rules addressing how the transition year is determined for a jurisdiction and how tax adjustments are recognised after year-end.

Observation: *The simplified ETR safe harbour will be a welcome change for some in-scope MNE groups which would inadvertently fail the transitional CbCR safe harbour because of amounts that were excluded from GloBE income. This could happen, for example, in cases involving significant share disposals or dividends received from non-constituent entities, which often resulted in non-eligibility for the transitional CbCR safe harbour despite no top-up tax being payable. It is also expected to ease compliance burdens in jurisdictions that consistently apply rates above the minimum threshold.*

This safe harbour may be considered a modest step toward operational simplification under Pillar Two, but it remains far from simple to apply, as the rules governing it span more than 50 pages. In practice, it closely follows the GloBE model rules and as a result, most groups will see considerable differences compared to their financial statements. Moreover, in-scope MNE groups using multiple accounting standards — particularly where LFAS rules apply — should evaluate how these will interact with CFS data under the proposed rules.

Although optional adjustments may help some groups meet the safe harbour requirements, others might find the simplified ETR safe harbour more restrictive than the transitional CbCR safe harbour due to the prescriptive rules. For some businesses, the ability to elect simplified treatment on a jurisdiction-by-jurisdiction basis will enable a hybrid approach, applying full GloBE calculations only in low-tax or complex jurisdictions.

Extension of the transitional CbCR safe harbour

Under the transitional CbCR safe harbour, the top-up tax for a jurisdiction will generally be deemed to be zero if the de minimis test, simplified ETR test or routine profits test is met for the fiscal year.

To facilitate transition to the new simplified ETR safe harbour, the OECD extends the transitional CbCR safe harbour by one year to all fiscal years commencing on/before 31 December 2027 and ending on/before 30 June 2029 (Transitional Period). The ETR rate will remain at 17% for the one-year extension. During the Transitional Period, taxpayers may choose whether to apply the transitional CbCR safe harbour or the simplified ETR safe harbour.

Substance-based tax incentive safe harbour

This safe harbour provides a favourable treatment for qualified tax incentives (QTIs) by treating their tax values as covered taxes and excluding them from GloBE income when calculating the ETR, effectively treating them as if additional tax had been paid.

To qualify as a QTI, the incentive must be generally available (i.e. not arising from a specific governmental arrangement), and must be an expenditure- or production-based tax incentive as outlined below:

Tax incentives	Details
Expenditure-based	• Such incentives must be mechanically and directly linked to the qualifying expenditure incurred (e.g. a tax credit or super deduction). • Immediate expensing and accelerated depreciation do not qualify as QTIs because they affect only the timing of deductions rather than the quantum of tax benefit. • An incentive does not qualify as a QTI if the value of the tax benefit exceeds the expenditure incurred.
Production-based	• Such incentives must be related to measurable output (e.g. units produced or emissions reduced) and based on the volume of tangible production (e.g. manufacturing) within the respective jurisdiction. • Incentives based on production value are explicitly excluded.

In-scope MNE groups may also elect to treat a qualified refundable tax credit (QRTC) or marketable transferable tax credit (MTTC), which are otherwise treated as GloBE income and are generally dilutive to the ETR, as a QTI, provided that the relevant conditions are met. The election can be made for some QRTCs or MTTCs, and for part of the income of a QRTC or MTTC.

QTIs are subject to a cap as follows:

(1) 5.5% of the greater of the eligible payroll costs or the depreciation/depletion of eligible tangible assets (as defined); or
(2) if a 5-year election is made, 1% of the carrying value of eligible tangible assets (as defined) in the jurisdiction, excluding land and other non-depreciable assets.

Observation: *Although described as a safe harbour, the substance-based tax incentive safe harbour functions less like a traditional safe harbour and more as an election for favourable treatment.*

Given the various qualifications and caps, businesses should carefully model the impact of an election to maximise potential benefits. In particular, this safe harbour is more likely to provide benefits in jurisdictions with higher payroll or tangible assets – resulting in a higher substance cap – or where QRTC/MTTC incentives are substantial enough to reduce the GloBE ETR below 15%. Conversely, if the *substance cap is low or the jurisdictional ETR already exceeds 15%, the election may not provide any benefit.*

Tax accounting considerations

For financial reporting purposes, accounting standards such as IFRS, US GAAP and HKFRS require the effects of a change in tax law to be accounted for in the period in which the law is substantively enacted or enacted. The OECD's GloBE administrative guidance (including the Package) is generally not considered tax law, as most jurisdictions with Pillar Two regimes in force will need further legislative action to incorporate the guidance into local law. The tax effects of the Package should be accounted for in the period when the legislative steps are completed and therefore considered substantively enacted or enacted. Companies should consider whether financial statement disclosure is needed to the extent the Package is expected to have a significant impact.

Transitional qualified status for domestic GloBE legislation

The top-up tax payable in a jurisdiction arises from the combined effect of the GloBE rules, namely the IIR and UTPR, and a separate QDMTT, applied under an agreed order of application. This order is achieved by turning off or adjusting the effect of the GloBE rules in one jurisdiction when qualified rules in another jurisdiction take priority, and thus depends on each implementing jurisdiction recognising such 'qualified' status. For example, where a jurisdiction has QDMTT safe harbour status, the application of the GloBE rules of other jurisdictions is turned off by deeming the top-up tax payable in other jurisdictions under their GloBE rules in respect of the low-taxed profits arising in the first-mentioned jurisdiction to be zero.

Since it is not possible to conduct a full legislative review for each jurisdiction in the short term to determine if their domestic GloBE legislation is qualified, a simplified transitional mechanism was developed to allow jurisdictions to temporarily self-certify their qualified status. Consequently, the OECD released the central record of legislation with transitional qualified status in early 2025, setting out:

(i) the jurisdictions whose IIR and/or domestic minimum top-up tax (DMTT) rules have obtained a transitional qualified status; and
(ii) whether the QDMTTs of the jurisdictions are eligible for the QDMTT safe harbour on a transitional basis.

The central record is updated regularly and the latest update is summarised below:

Jurisdiction	Qualified IIR	QDMTT	Eligible for QDMTT safe harbour	Effective date
Hong Kong	✓	✓	✓	1 January 2025
Bahrain	N/A	✓	✓	1 January 2025
Qatar	✓	✓	✓	1 January 2025

Observation: *With the HKMTT qualified as a QDMTT, Hong Kong can have the first priority to collect any top-up tax in respect of low-tax profits arising in Hong Kong. Furthermore, since the HKMTT is eligible for the QDMTT safe harbour, the top-up tax for Hong Kong that may be imposed by foreign jurisdictions on in-scope MNE groups will generally be deemed to be zero.*

It is worth noting that the QDMTT safe harbour includes a switch-off rule, but the central record does not specify whether this rule is triggered in the jurisdictions listed. If the switch-off rule applies, in-scope MNE groups may be unable to benefit from the QDMTT safe harbour for all or certain *constituent entities within the QDMTT jurisdiction. In such cases, they would need to apply the credit method to relieve double taxation under the GloBE rules in respect of a QDMTT. Consequently, additional calculations under the IIR and/or UTPR may be required, potentially resulting in further top-up tax. In-scope MNE groups should therefore carefully review the domestic QDMTT legislation in the relevant jurisdictions to assess whether the switch-off rule will apply in their particular circumstances.*

The transitional qualified status is expected to apply from the effective date of the legislation until the completion of the full legislative review (which is expected to start within two years after the effective date of the legislation). If the legislation is considered not qualified under the full legislative review, the loss of the qualified status will not be retrospective.

As the central record is updated regularly, in-scope MNE groups with presence in jurisdictions that have implemented / will implement an IIR and/or a DMTT but are not yet included in the central record should closely monitor any subsequent updates in this regard.

Implications of the Package for taxpayers in Hong Kong

Implementation in Hong Kong

It is expected that the Hong Kong SAR government (Government) will incorporate the Package into the Inland Revenue Ordinance through subsidiary legislation.

Implications for in-scope MNE groups in Hong Kong

Subject to the legislative enactment of the Package in Hong Kong, the implications for in-scope MNE groups with presence in Hong Kong are set out below:

Consideration	Implications
SbS safe harbour	• The SbS safe harbour applies to US-headquartered MNE groups only from fiscal year 2026; accordingly, any IIR or UTPR top-up tax payable in Hong Kong will be deemed zero from that year onwards; however, compliance obligations, including the filing of GIRs, continue to apply. Any top-up tax payable in Hong Kong for fiscal year 2025 is unaffected. • However, Hong Kong entities belonging to a non-US headquartered MNE group with a US intermediate parent will remain subject to IIR and UTPR (including from fiscal year 2026 onwards), since the SbS safe harbour applies only to groups headquartered in jurisdictions with a qualified SbS regime. • Since the SbS safe harbour will not affect the application of HKMTT, the Hong Kong entities and JVs of in-scope MNE groups that have elected this safe harbour will remain subject to the HKMTT. • Hong Kong-headquartered MNE groups would not be eligible for this safe harbour because Hong Kong's statutory CIT rate is lower than 20% and Hong Kong does not have a worldwide tax system.

	• Regarding JVs, since this safe harbour applies only to the JV partner that is a US-headquartered MNE group, any fellow JV partner that is non-US-headquartered and having a presence in Hong Kong would still be subject to the GloBE and HKMTT rules, which will may also impact the JVs. Any commercial arrangement concerning Pillar Two indemnities may remain relevant.
UPE safe harbour	• Since the UTPR is not yet effective in Hong Kong and no jurisdiction has been listed as having a qualified UPE regime yet, this safe harbour currently does not have any imminent implications for top-up tax payable in Hong Kong. • Hong Kong-headquartered MNE groups would not be eligible for this safe harbour because Hong Kong's statutory CIT rate is lower than 20%.
Transitional CbCR safe harbour	• The one-year extension should be welcomed by in-scope MNE groups eligible for the safe harbour in Hong Kong.
Simplified ETR safe harbour	• This new safe harbour provides greater flexibility to in-scope MNE groups in relieving their compliance burden under Hong Kong's GloBE and HKMTT rules, especially for fiscal years in which both the transitional CbCR safe harbour and simplified ETR safe harbour are available. • The safe harbour will generally apply from a fiscal year commencing on/after 31 December 2026 (i.e. effectively fiscal year 2027). It remains to be seen whether Hong Kong will adopt the optional provision such that in-scope MNE groups meeting the relevant conditions can apply the safe harbour one year earlier. • Also, Hong Kong has yet to confirm if it will allow an election to adopt the CFS for HKMTT under this safe harbour.
Substance-based tax incentive safe harbour	• In Hong Kong, it appears that only the enhanced tax deductions for research and development expenditure would qualify, as other preferential tax regimes are neither expenditure-based nor production-based incentives. In addition, Hong Kong currently does not operate any tax concessions that qualify as QRTCs or MTTCs. • Whether the Government will redesign Hong Kong's preferential tax regimes to meet QTI parameters, thereby enabling more in-scope MNE groups to access the safe harbour, remains to be seen.

The takeaway

While the Package introduced some welcome changes that may ease compliance burdens for in-scope MNE groups, the rules remain complex. Such groups should review the Package to understand which aspects they can or must apply, in which jurisdictions, and what the safe harbours mean for compliance burden mitigation.

Since most jurisdictions will need to undertake further legislative procedures to incorporate the Package into local law, in-scope MNE groups should closely monitor such developments in jurisdictions where they have business presence. Understanding the exact dates when jurisdictions legally implement the Package and the corresponding effective dates is critical for such groups to determine their eligibility to elect the safe harbours and to manage compliance and financial reporting obligations.

As the OECD continues to work on additional clarifications and simplifications, in-scope MNE groups should also closely monitor further updates in this regard, including:

- a de minimis safe harbour and a routine profits safe harbour designed to replace similar tests under the transitional CbCR safe harbour (scheduled to conclude within the first half of 2026);
- further simplifications for investment entities and minority-owned constituent entities under the simplified ETR safe harbour (scheduled to conclude within the first half of 2026);
- further simplification of the GloBE rules with a particular focus on continuity issues;
- further administrative guidance on technical issues relating to the GloBE rules;
- exploring integration of the simplified calculations in the simplified ETR safe harbour into the design of the global minimum tax; and
- streamlining reporting obligations (scheduled to conclude within the first half of 2026).

We will continue to monitor developments in this space and provide updates as they arise. Should you have any questions on how this Package may affect your businesses, please do not hesitate to contact us.

Endnotes

1. The Package can be accessed via this link: https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/global-minimum-tax/side-by-side-package.pdf

2. The list of jurisdictions can be accessed via this link: https://www.oecd.org/en/topics/sub-issues/global-minimum-tax/central-record-of-legislation-with-transitional-qualified-status.html

3. The PwC Global Tax Policy Alerts can be accessed via the links below:
https://www.pwc.com/gx/en/tax/newsletters/tax-policy-bulletin/assets/pwc-oecd-announces-agreement-on-range-of-new-pillar-two-safe-harbours.pdf
https://www.pwc.com/gx/en/tax/newsletters/tax-policy-bulletin/assets/pwc-oecd-publishes-pillar-two-side-by-side-system.pdf
https://www.pwc.com/gx/en/tax/newsletters/tax-policy-bulletin/assets/pwc-pillar-two-simplified-etr-safe-harbour.pdf
https://www.pwc.com/gx/en/tax/newsletters/tax-policy-bulletin/assets/pwc-substance-based-tax-incentive-safe-harbour-pillar-two-groups.pdf

4. The list can be accessed via the link in Endnote 2.

Let’s talk

For a deeper discussion of how this impacts your business, please contact:

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