

عرض خدمات التعليم الإحترافي والتدريب



PFA
CMA
DiplFR
TAX
EAS
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السادة / شركة

نتوجه الي سيادتكم بوافر الشكر والامتنان لتواصلكم مع **ATC أشرف عبد الغني** (محاسبون قانونيون وخبراء ضرائب)

❖ مزايا الدراسة و التدريب مع **ATC Pro Training** (قطاع التعليم الإحترافي والتدريب):

- محاضرين علي أعلى درجة من التأهيل العلمي والمهني , أصحاب خبرات محلية ودولية تتجاوز 30 عام بكبري الشركات ومكاتب المحاسبة والمراجعة.
- تسجيل المحاضرات بالكامل فيديو عالي الجودة و اتاحتها لكم.
- التمتع باستخدام اكبر بنك اسئلة علي موقعنا الالكتروني .
- استخدام احدث تكنولوجيا العرض التفاعلي و الشاشات الحديثة .
- المتابعة المستمرة للدارسين و التواصل المستمر معهم من خلال فريق منسق التعليم الاحترافي لتسهيل اي صعوبات لديهم و الرد علي جميع اسئلتهم.

بداية الكورس القادم
06/01/2023

تفاصيل الكورس

➤ المقدمة:

مع **ATC Pro Training** سيتم دراسة اعداد القيود المحاسبية ومهارات تلخيص وعرض كافة بنود القوائم المالية بما فيها المخزون وحسابات العملاء وحسابات الموردين والاصول طويلة الاجل والالتزامات قصيرة وطويلة الاجل وبنود حقوق الملكية.

بالاضافة الى اساسيات اجراءات الرقابة الداخلية وكيفية الحفاظ علي اصول الشركة وتجنب الخطأ في توجيه القيود المحاسبية وفي صرف مستحقات الموردين. كما سنتعرف عن أكثر برامج الـ **ERP** استخداما.

دراسة الـ **PFA** تأهلك بدرجة كبيرة لدراسة الشهادات الدولية مثل **CMA** و **CPA** ودبلومة معايير المحاسبة الدولية **DipIFR**. كما يتم دراسة الجوانب الأساسية لأهم أنواع الضرائب المطبقة في مصر والقوانين المرتبطة بها.

الدراسة باللغة الانجليزية ولكن في **ATC Pro Training** سنساعدك من خلال الشرح باللغتين الإنجليزية والعربية .

➤ مدة الكورس:

3 شهور (يوم في الاسبوع - الجمعة من السد 10- ساعة الى السد 3- ساعة) في شركتنا.

➤ سعر الكورس:

سعر الكورس حضور في شركتنا = 3000، و حضور اونلاين = 2,500 للفرد الواحد

جدول الكورس

#	Lecture	Chapter Name	Start Time	End Time
1	1	Conceptual Framework & AIS	10:00 am	3:00 pm
2	2	Financial Statements & Cash	10:00 am	3:00 pm
3	3	Receivables & Inventory	10:00 am	3:00 pm
4	4	PP&E and Intangible Assets	10:00 am	3:00 pm
5	5	Bonds & Leases	10:00 am	3:00 pm
6	6	Investments & Revenue Recognition	10:00 am	3:00 pm
7	7	Stockholders' Equity & Cash Flows	10:00 am	3:00 pm
8	8	Case Study 1	10:00 am	3:00 pm
9	9	Case Study 2	10:00 am	3:00 pm
10	10	Financial Analysis & Financial Controls	10:00 am	3:00 pm
11	11	Taxation (income, Value Added, WH)	10:00 am	3:00 pm
12	12	Excel for Accounting & ERPs	10:00 am	3:00 pm

بداية الكورس القادم
23/12/2022

تفاصيل الكورس

➤ المقدمة:

شهادة الـ **CMA** هي افضل شهادة دولية معتمدة في مجال الإدارة المالية.

عندما تحصل على شهادة الـ **CMA** فذلك يعني انك حصلت علي اعتماد من أكبر معهد في العالم متخصص في المحاسبة الإدارية وهو معهد الـ **IMA**، وإنك أصبحت جاهز للعمل بالشركات والبنوك الكبرى.

مع **ATC Pro Training** ستتعرف على اساسيات الإدارة المالية لتكون مدير مالي ناجح، ستتعلم : اعداد القوائم المالية - الرقابة الداخلية - إتخاذ القرارات الادارية - ادارة المخاطر - إدارة البيانات الضخمة وتوظيف تكنولوجيا المعلومات في التحليل والتنبؤ - نظم التكاليف المختلفة وكيفية تطبيقها - تقييم و تحليل الاداء للاقسام - التخطيط الاستراتيجي - الامام باخلاقيات المهنة.

الدراسة باللغة الانجليزية ولكن في **ATC Pro Training** سنساعدك من خلال الشرح باللغتين الإنجليزية والعربية .

➤ مدة الكورس:

4.5 شهور (يوم في الاسبوع - الجمعة من الساعة 10 الى الساعة 3) في شركتنا.

➤ سعر الكورس:

سعر الكورس حضور في شركتنا = 8000 ، و حضور اونلاين = 7500 للفرد الواحد

جدول الكورس

#	Date	Main Unit	Study Subjects	Start Time	End Time
1	Lecture 1	Financial Reporting	Financial Statements	03:30 pm	08:30 pm
2	Lecture 2	Financial Reporting	Revenue Recognition, Accounts Receivable and Inventory	03:30 pm	08:30 pm
3	Lecture 3	Financial Reporting	Investments, Consolidation and Different Types of Exp.& Liabilities	03:30 pm	08:30 pm
4	Lecture 4	Financial Reporting	PP&E, Intangible Assets, Leases	03:30 pm	08:30 pm
5	Lecture 5	Financial Reporting	Income Taxes, Bonds and Integrated Reporting 1	03:30 pm	08:30 pm
6	Lecture 6	Financial Reporting	Integrated Reporting 2 and Revision on FAR	03:30 pm	08:30 pm
7	Lecture 7	Cost Management	Cost Management Concepts	03:30 pm	08:30 pm
8	Lecture 8	Cost Management	Cost Accumulation Concepts	03:30 pm	08:30 pm
9	Lecture 9	Cost Management	Cost Accumulation Concepts, Cost Allocation Techniques	03:30 pm	08:30 pm
10	Lecture 10	Cost Management	Cost Allocation Techniques	03:30 pm	08:30 pm
11	Lecture 11	Cost Management	Operational Efficiency & Business Process Performance	03:30 pm	08:30 pm
12	Lecture 12	Planning and Budgeting	Review on Cost Management , Corr. & Regression and Learning Curve	03:30 pm	08:30 pm
13	Lecture 13	Planning and Budgeting	Strategic Management, Budgeting Process and Master Budget	03:30 pm	08:30 pm
14	Lecture 14	Planning and Budgeting	Operating Budget, Cash Budget, Performance FS and Revision	03:30 pm	08:30 pm
15	Lecture 15	Performance Management	Direct Cost Var., Mix Var., Overhead Var. and Sales Variance	03:30 pm	08:30 pm
16	Lecture 16	Performance Management	Responsibility Centers, Comparing Performance of Inv. Centers	03:30 pm	08:30 pm
17	Lecture 17	Internal Controls	Internal Auditing, Revision on Perf. Mgmt, Corp Gov, Risk and Internal Controls	03:30 pm	08:30 pm
18	Lecture 18	Internal Controls	Flow Charting, Control Procedures and Syst. Controls, Types of Controls, CAAT, Business Continuity Planning, Data Gov.	03:30 pm	08:30 pm
19	Lecture 19	Technology and Analytics	Revision on Internal Controls, Analytics, Big Data and Data Mining, COBIT	03:30 pm	08:30 pm
20	Lecture 20	Technology and Analytics	Simple Regression, Predictive Analyst., Data Visualization and Revision	03:30 pm	08:30 pm

بداية الكورس القادم
27/05/2022

تفاصيل الكورس

➤ المقدمة:

دبلومة المعايير الدولية لإعداد التقارير المالية **DiplFR** تمثل نقلة كبيرة في المسار الوظيفي لدارسها ومن خلال دراستها ستصل الى مستوى احترافي متميز في إعداد القوائم المالية وتحليلها وتفسيرها، وستضيف لسيرتك المهنية مستوى عالي من الإحتراف والخبرة .

بصرف النظر عن نوع الوظيفة سواء كانت محاسب، مدير مالي ، مراجع خارجي ، مراجع داخلي ، محلل مالي او ان الوظيفة مرتبطة بمجال المحاسبة والإدارة المالية والبنوك فإن دبلومة المعايير الدولية لإعداد التقارير المالية تمثل قيمة مضافة عالية لك
الدبلومة يمنحها أكبر وأقدم جهة دولية تدعم مهنة المحاسبة والمراجعة علي مستوى العالم وهي . **ACCA**

الدراسة باللغة الانجليزية ولكن في **ATC Pro Training** سنساعدك من خلال الشرح باللغتين الإنجليزية والعربية .

➤ مدة الكورس:

4.5 شهور (يوم في الاسبوع – السبت من الساعة 10- الساعة الى الساعة 3) في شركتنا.

➤ سعر الكورس:

سعر الكورس حضور في شركتنا = 8000، و حضور اونلاين = 7500 للفرد الواحد

جدول الكورس

#	Date	Ch#	Chapter Name	Standard #	Start Time	End Time
1	Lecture 1	1 & 2	The IASB & Concept. Framework	NA	10:00 am	03:00 pm
2	Lecture 2	1	First time Adoption of IFRS & Code of Ethics	IFRS 1 & IESBA Code of Ethics	10:00 am	03:00 pm
3	Lecture 3	4 & 15	Presentation of published FS / Accounting for Tangible NCA	IAS 1 & IAS 16	10:00 am	03:00 pm
4	Lecture 4	4	Accounting for Tangible NCA	IASs 20, 23, 40	10:00 am	03:00 pm
5	Lecture 5	7 & 5	Intangible Assets and GW & Impairment of Assets	IASs 38 & 36	10:00 am	03:00 pm
6	Lecture 6	8 & 12	Provisions and Contingencies & For. Currency Transl.	IASs 37 & 21	10:00 am	03:00 pm
7	Lecture 7	13	Inventories & Agriculture & Mineral Resources	IAS 2 & IAS 41 & IFRS 6	10:00 am	03:00 pm
8	Lecture 8	17 & 18	Earnings per Share & Segment Reporting	IAS 33 & IFRS 8	10:00 am	03:00 pm
9	Lecture 9	3	Revenue from Contracts with Customers	IFRS 15	10:00 am	03:00 pm
10	Lecture 10	6	Accounting for Leases	IFRS 16	10:00 am	03:00 pm
11	Lecture 11		Revision		10:00 am	03:00 pm
12	Lecture 12	16	Reporting Financial Performance	IAS 10 & IAS 8 & IFRS 5	10:00 am	03:00 pm
13	Lecture 13	9 & 18	Employee Benefits & Related Party Disclosures	IAS 19 & IAS 24	10:00 am	03:00 pm
14	Lecture 14	14	Share-Based Payment	IFRS 2	10:00 am	03:00 pm
15	Lecture 15	11	Accounting for Taxation	IAS 12	10:00 am	03:00 pm
16	Lecture 16	10	Financial Instruments & Fair Value	IAS 32 & IFRS 3 & IFRS 9	10:00 am	03:00 pm
17	Lecture 17	10	Financial Instruments	IFRS 9 & IFRS 7	10:00 am	03:00 pm
18	Lecture 18	19 & 20	SMEs & Constitution of a Group	IFRS 10	10:00 am	03:00 pm
19	Lecture 19	23 & 24 & 21	Acctg for Assoc. & Acctg for JVs & Cons. Stat. of FP	IFRS 3 & IFRS 11	10:00 am	03:00 pm
20	Lecture 20	21 & 22	Cons. Stat. of FP & Cons. Stat. of OCI	IFRS 10	10:00 am	03:00 pm
21	Lecture 21		Revision		10:00 am	03:00 pm

بداية الكورس القادم
3/6/2023

تفاصيل الكورس

➤ المقدمة:

في ظل المستجدات الأخيرة التي طرأت على قوانين الضرائب بشكل عام وقانون الإجراءات الضريبية الموحد وظهور نظام الفاتورة الإلكترونية مؤخرًا وتعميم تطبيقه على جميع الشركات من بدايه شهر يوليو 2021. فإن توجيهك للطريق الصحيح هو الخطوة الايجابية المطلوبة للتطوير .

ولأننا من أولى الشركات المتخصصة في الضرائب في مصر والشرق الأوسط .
فسنوفر لك كل المعلومات والتطورات الجديدة المتعلقة بكيفية تطبيق الفاتورة الإلكترونية وأهم قوانين الضرائب على اختلاف أنواعها، أرباح تجارية، قيمة مضافة، كسب عمل، دمه.

بالإضافة الى أن اهم المميزات التي تميزنا عن غيرنا من الأماكن إنك ستقوم بدراسة كل نوع من أنواع الضرائب على أيدي كوادر من المحاضرين المتخصصين لكل ضريبه وعلى قدر كبير من الكفاءة والخبرة أكثر من 30 سنة، وهذا ما يوفر عليك المجهود المبذول في البحث في عدة أماكن وسيوصلك للاحترافية في أسرع وقت.

الدراسة باللغة الانجليزية ولكن في **ATC Pro Training** سنساعدك من خلال الشرح باللغتين الإنجليزية والعربية .

➤ مدة الكورس:

2 شهر (يومين في الاسبوع - السبت من السد 10-اعة الى السد 3-اعة والثلاثاء من السد 6:30-اعة الى السد 9:30-اعة) في شركتنا.

➤ سعر الكورس:

سعر الكورس حضور في شركتنا = 3000 ، و حضور اونلاين = 2500 للفرد الواحد

جدول الكورس

#	التاريخ	اليوم	عدد الساعات	الموضوع	التفاصيل	المحاضر	الفترة
1		السبت	5	الضريبة علي ارباح الأشخاص الإعتبارية	المحاسبة الضريبية/اعداد الاقرار / نظام الخصم والتحصيل/دراسة السعر المحايد/طبيعة التعامل بين الاشخاص المرتبطة/ توزيعات الارباح/ الثروة العقارية/ المحاسبة الضريبية للعقود طويلة الأجل/الاتفاقيات الدولية	أ/ أحمد شحاته	10 am – 3 pm
2		الثلاثاء	3	الضريبة علي ارباح الأشخاص الإعتبارية	المحاسبة الضريبية/اعداد الاقرار / نظام الخصم والتحصيل/دراسة السعر المحايد/طبيعة التعامل بين الاشخاص المرتبطة/ توزيعات الارباح/ الثروة العقارية/ المحاسبة الضريبية للعقود طويلة الأجل/الاتفاقيات الدولية	أ/ أحمد شحاته	6:30 pm - 9:30 pm
3		السبت	5	الضريبة علي ارباح الأشخاص الإعتبارية	المحاسبة الضريبية/اعداد الاقرار / نظام الخصم والتحصيل/دراسة السعر المحايد/طبيعة التعامل بين الاشخاص المرتبطة/ توزيعات الارباح/ الثروة العقارية/ المحاسبة الضريبية للعقود طويلة الأجل/الاتفاقيات الدولية	أ/ أحمد شحاته	10 am - 3 pm
4		الثلاثاء	3	الضريبة علي ارباح الأشخاص الإعتبارية	المحاسبة الضريبية/اعداد الاقرار / نظام الخصم والتحصيل/دراسة السعر المحايد/طبيعة التعامل بين الاشخاص المرتبطة/ توزيعات الارباح/ الثروة العقارية/ المحاسبة الضريبية للعقود طويلة الأجل/الاتفاقيات الدولية	أ/ أحمد شحاته	6:30 pm - 9:30 pm
5		السبت	5	ضريبة كسب العمل	المحاسبة الضريبية / الاقرارات الربع سنوية/التسوية السنوية	المحسن سعدى	10 am - 3 pm
6		الثلاثاء	3	ضريبة كسب العمل	المحاسبة الضريبية / الاقرارات الربع سنوية/التسوية السنوية	المحسن سعدى	6:30 pm - 9:30 pm
7		السبت	5	ضريبة القيمة المضافة	المحاسبة الضريبية /نطاق القانون/ استحقاق الضريبة/ وعاء الضريبة/ الخصم الضريبي/ ضريبة الجدول/ الطعن وتشكيل اللجان/ الجرائم والعقوبات/التصالح/ الاقرار	أ/ علاء السيد	10 am - 3 pm
8		الثلاثاء	3	ضريبة القيمة المضافة	المحاسبة الضريبية /نطاق القانون/ استحقاق الضريبة/ وعاء الضريبة/ الخصم الضريبي/ ضريبة الجدول/ الطعن وتشكيل اللجان/ الجرائم والعقوبات/التصالح/ الاقرار	أ/ علاء السيد	6:30 pm - 9:30 pm
9		السبت	5	ضريبة القيمة المضافة	المحاسبة الضريبية /نطاق القانون/ استحقاق الضريبة/ وعاء الضريبة/ الخصم الضريبي/ ضريبة الجدول/ الطعن وتشكيل اللجان/ الجرائم والعقوبات/التصالح/ الاقرار	أ/ علاء السيد	10 am - 3 pm
10		الثلاثاء	3	ضريبة القيمة المضافة	المحاسبة الضريبية /نطاق القانون/ استحقاق الضريبة/ وعاء الضريبة/ الخصم الضريبي/ ضريبة الجدول/ الطعن وتشكيل اللجان/ الجرائم والعقوبات/التصالح/ الاقرار	أ/ علاء السيد	6:30 pm - 9:30 pm
11		السبت	5	ضريبة الدمغة والضريبة العقارية	المحاسبة الضريبية	أ/فكري جرجس	10 am - 3 pm
12		الثلاثاء	3	تأثير التطور التكنولوجي علي مصلحة الضرائب	رفع الاقرارات علي المنظومتين (ضريبة الدخل وخصم وضافة)	أ/احمد عبد الفتاح مجاهد	6:30 pm - 9:30 pm
13		السبت	5	تأثير التطور التكنولوجي علي مصلحة الضرائب	رفع الاقرارات علي المنظومتين (قيمة مضافة) / نبذه عن الفاتورة الالكترونية	أ/احمد صبحي	10 am – 3 pm

بداية الكورس القادم
26/1/2022

تفاصيل الكورس

➤ المقدمة:

يوجد 3 معايير محاسبية جديدة يجب تطبيقها الآن علي ميزانيات 2021 ومن الطبيعي أن هذه المعايير قد ألغت معايير سابقة وعدلت معايير أخرى، المعايير الجديدة معايير مهمة جدا بتحكم تسجيل وعرض الإيرادات والاستثمارات المالية والقروض واي أصول مؤجرة معايير 47 (الأدوات المالية) و 48 (الإيرادات من عقود العملاء) و 49 (عقود التأجير)

مع **ATC Pro Training** ستتعرف على كل المعايير الجديدة والمعايير التي تم الغاؤها وباقي المعايير الهامة.

في هذا الكورس ستعرف كيفية اعداد القوائم المالية بصورة صحيحة وتطبيق المعايير الجديدة علي القوائم المالية لسنة 2022 كما نقدم لك كورس شامل عن معايير المحاسبة المصرية وآليات تطبيقها والافصاحات الضرورية المرتبطة بها وأمثلة عملية شاملة.

الدراسة باللغة الانجليزية ولكن في **ATC Pro Training** سنساعدك من خلال الشرح باللغتين الإنجليزية والعربية .

➤ مدة الكورس:

7 اسابيع (يومين في الاسبوع - السبت من السد 3:30 ساعة الى السد 8:30 ساعة والثلاثاء من السد 6:30 ساعة الى السد 9:30 ساعة) في شركتنا.

➤ سعر الكورس:

سعر الكورس حضور في شركتنا = 3000 ، و حضور اونلاين = 2500 للفرد الواحد

جدول الكورس

#	Standers	EAS #	Date	Day	Time (From)	Time (To)	Duration
1	إطار إعداد وعرض القوائم المالية - عرض القوائم المالية	(1)		Saturday	3:30 PM	8:30 PM	5
2	الأصول الثابتة وإهلاكاتها - الإستثمار العقاري	(10) - (34)		Tuesday	6:30 PM	9:30 PM	3
3	تكاليف الاقتراض - الأصول غير الملموسة - اضمحلال قيمة الأصول	(14) - (23) - (31)		Saturday	3:30 PM	8:30 PM	5
4	المخزون - قائمة التدفقات النقدية	(2) - (4)		Tuesday	6:30 PM	9:30 PM	3
5	الأحداث التي تقع بعد الفترة المالية - الإفصاح عن الأطراف ذوي العلاقة - نصيب السهم في الأرباح	(7) - (15) - (22)		Saturday	3:30 PM	8:30 PM	5
6	المخصصات والالتزامات المحتملة والأصول المحتملة - السياسات المحاسبية والتغيرات في التقديرات المحاسبية والأخطاء	(5) - (28)		Tuesday	6:30 PM	9:30 PM	3
7	آثار التغيرات في أسعار صرف العملات الأجنبية - ضرائب الدخل	(13) - (24)		Saturday	3:30 PM	8:30 PM	5
8	الإستثمارات في شركات شقيقة - الأدوات المالية (مقدمة)	(18) - (47)		Tuesday	6:30 PM	9:30 PM	3
9	الأدوات المالية	(47)		Saturday	3:30 PM	8:30 PM	5
10	الأدوات المالية	(47)		Tuesday	6:30 PM	9:30 PM	3
11	الأدوات المالية	(47)		Saturday	3:30 PM	8:30 PM	5
12	الإيراد من العقود مع العملاء	(48)		Tuesday	6:30 PM	9:30 PM	3
13	الإيراد من العقود مع العملاء	(48)		Tuesday	6:30 PM	9:30 PM	3
14	الإيراد من العقود مع العملاء + (حالات عملية علي المعيار)	(48)		Saturday	3:30 PM	8:30 PM	5
15	عقود التأجير	(49)		Tuesday	6:30 PM	9:30 PM	3
16	عقود التأجير + (حالات عملية علي المعيار)	(49)		Saturday	3:30 PM	8:30 PM	5
17	(حالات عملية علي المعايير)			Tuesday	6:30 PM	9:30 PM	3

بداية الكورس القادم
21/12/2022

تفاصيل الكورس

المقدمة: ➤

" ورشة الفاتورة الإلكترونية والإيصال الإلكتروني "

موضوع العصر ويهم كثير من الأشخاص والشركات في الفترة الأخيرة، وقد اصبح من الضروري لكل شخص له علاقة بالفواتير أن يكون على دراية تامة به وبالنظام القائم عليه

*الفاتورة الالكترونية :

هي نظام منخفض التكاليف لمعالجة المعاملات التي تستفيد من تكنولوجيا المعلومات لتحويل عملية إعداد الفواتير اليدوية والورقية إلى صيغة الكترونية أكثر فاعلية في معالجة رسائل البيانات والمحافظة على السجلات.

في **ATC Pro Training** وبعد معرفة نبذة عن **الفاتورة الالكترونية** سنقوم بتناول الموضوعات التالية في الكورس:

1. المقدمة.
2. التسجيل.
3. التكامل مع المنظومة.
4. تكويد السلع والخدمات.
5. التوقيع الالكتروني.
6. ادخال الفواتير بكافة الحالات.
7. اشعارات الاضافة.
8. اشعارات الخصم.
9. الغاء الفاتورة.
10. رفض الفاتورة.
11. تحويل المستند الورقي إلى نسخة الكترونية.
12. إنشاء الفاتورة الالكترونية.
13. تحويل الفاتورة الالكترونية.
14. استقبال الفاتورة الالكترونية.
15. الدخول الآلي في النظام المحاسبي للمشتري.
16. التحقق من الدخول في النظام المحاسبي.
17. اختيار أسلوب الدفع.
18. إدارة النزاع.
19. والموافقة النهائية على السداد.

*الايصال الالكتروني (منظومة ال-B2C):

يعني لو انت تاجر او كافيه بتتعامل مع مواطن او مستهلك من غير رقم تسجيل هنساعدك انك تنضم للمنظومه وتكود السلع والخدمات ونعرفك ازاى تتعامل مع المنظومة نفسها.
بدأت المنظومة في تشغيلها التجريبي من أول أبريل وهيتم تطبيقها على كل المنشآت مرحليا على مستوى الجمهورية وده قانون 206 لسنة 2020 مادته 32 ألزم بكده، ومخالفات هيعرضك انك تتحول للنياحة ويتخذ الإجراءات القانونية اتجاهك متنساش أن الغرامة من 20,000 إلى 100,000

بداية الكورس القادم
21/12/2022

تابع تفاصيل الكورس

في **ATC Pro Training** وبعد معرفة نبذة عن **الايصال الالكتروني** سنقوم بتناول الموضوعات التالية في الكورس:

1- ماهية الايصال الالكتروني. 2- التسجيل بالمنظومة. 3- تكويد السلع والخدمات. 4- التوقيع الالكتروني. 5- تكامل نظام ال P.O.S. 6- التطبيق العملي لبرنامج P.O.S. 7- شرح تكامل SDC Productions.

الدراسة باللغة الانجليزية ولكن في **ATC Pro Training** سنساعدك من خلال الشرح باللغتين الإنجليزية والعربية .

➤ مدة الكورس:

3 أيام (الاربعاء من الساعة 6:00 الى الساعة 10:00 والخميس من الساعة 6:00 الى الساعة 10:00 والسبت من الساعة 6:00 الى الساعة 10:00) في شركتنا.

➤ سعر الكورس:

سعر الكورس حضور في شركتنا = 1800 ، و حضور اونلاين = 1500 للفرد الواحد

The logo for ATC (Ashraf Abdel Ghani Professional Education & Training) features the letters 'ATC' in a bold, white, sans-serif font. The letters are set against a black background that is shaped like a large arrow pointing to the right. A red horizontal bar is positioned below the letters. The entire logo is contained within a black triangle that also points to the right, which is itself set against a larger, light gray arrow shape pointing right. A red triangle is visible at the top right corner of the overall image.

Ashraf Abdel Ghani
Professional Education & Training

Professional Education & Training Division



Dokki Branch : 48 Giza St., 5th Floor,
Appt 52 , Giza
Heliopolis Branch : 20 Roshdy St., Saffir
- Heliopolis



atcprotraining



www.atcprotraining.com



Info@atcprotraining.com



01201555383
01201555389
01278324333



About ATC

- 1. One of the best tax consultants in the region**
- 2. Member of Geneva Group International**
- 3. Operations in Egypt, KSA and UAE**
- 4. Serving a large portfolio of high profile customers in Egypt**
- 5. Customers include large banks, hotels, universities, industrial companies and other entities**



ADIT – An Orientation Session

By

Dr. Goma Ahmad Mosbah

**Chairman Advisor for International Taxation and
Training**



What does ADIT stand for?

1. **Advanced**
2. **Diploma**
3. **International**
4. **Taxation**



What does ADIT stand for?

ADIT is a professional qualification and credential, offered **globally** by the UK-based **C**hartered **I**nstitute **O**f **T**axation (**CIOT**) to international tax professionals.



What does international taxation mean?

1. International taxation is concerned with **cross-border transactions**.
2. The world is no longer made up of isolated islands. Example: **Amazon**

States' Tax Authorities

- 1. A states' tax authority generally belongs to the Ministry of Finance.**
- 2. Examples: Egyptian Tax Authority, Zakat, Tax and Customs Authority and Federal Tax Authority**



OECD – Policy maker in international taxation

1. **Organization** for
2. **Economic**
3. **Cooperation**
4. **Development**



Organization for Economic Cooperation and Development

1. An international organization.
2. Governments work together to:
 - a. find solutions to common challenges,
 - b. develop global standards,
 - c. share experience,
 - d. and identify best practices.

Who is ADIT for?



Who is ADIT for?

**Do you want to be among the few international
taxation experts?**

ADIT



Who is ADIT for?

Do you want to be among the **very few** ADIT holders in Egypt and the Arab world?

ADIT



Who is ADIT for?

Do you want to work for **international**
companies worldwide?

ADIT



Who is ADIT for?

Do you want to work for **international tax firms**?

ADIT



Who is ADIT for?

**Do you want to be promoted to a higher
position?**

ADIT



Who is ADIT for?

Do you want to get **a higher salary** than what
you get now?

ADIT



ADIT Holders in Egypt and the Gulf States

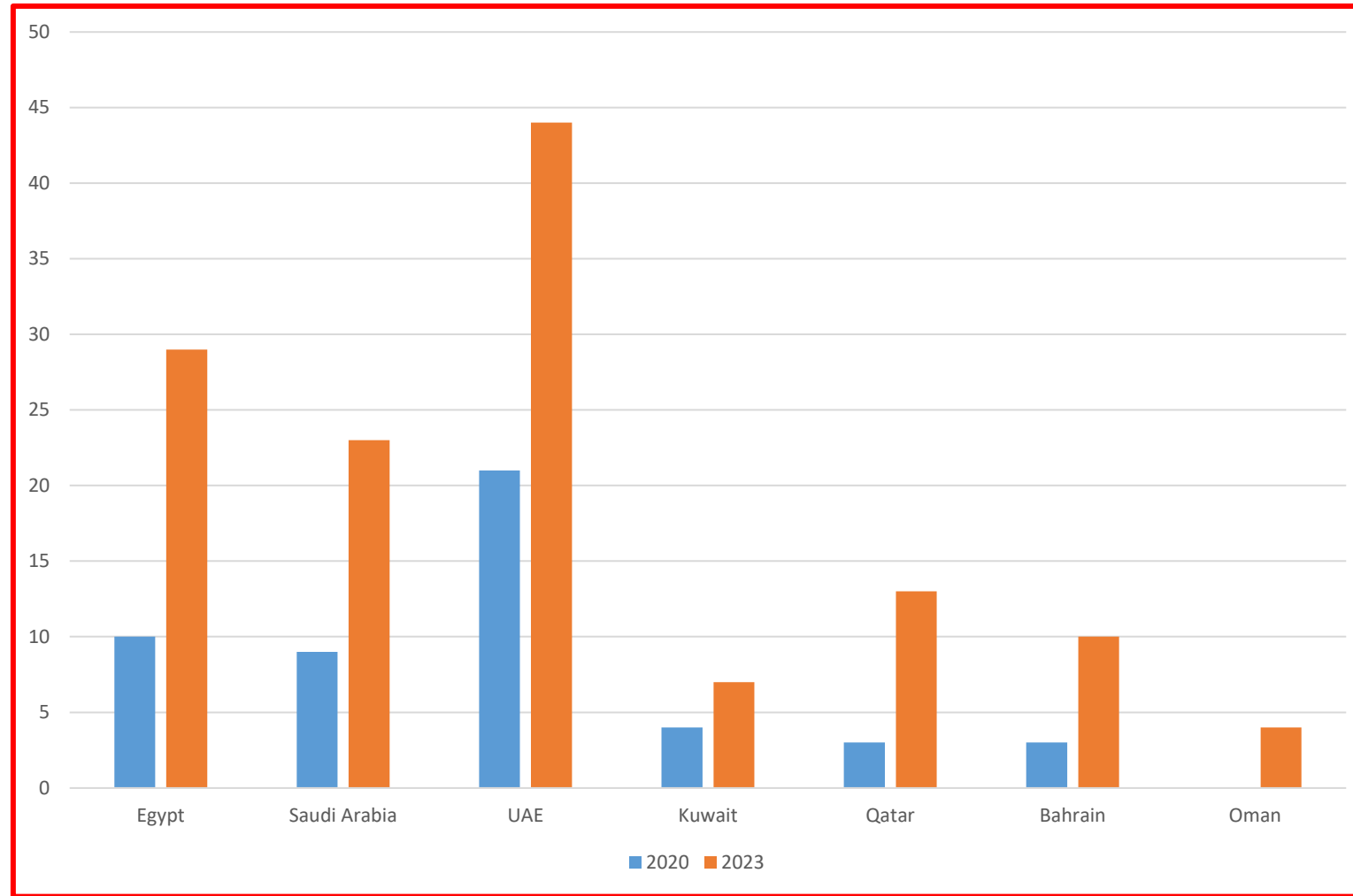


How many ADIT holders in Egypt and the Gulf States

	2020	2023
Egypt:	10	29
Saudi Arabia:	9	23
UAE:	21	44
Qatar:	3	13
Bahrain:	3	10
Kuwait:	4	7
Oman:	0	4



ADIT Holders in Egypt and the Gulf States



Is ADIT the way forward for you?

I believe, “Yes”.

Is it worth the effort and money?

Definitely, “Yes”.

Let’s look at the structure of the certificate



The Structure of the ADIT Certificate

ADIT Certificate Structure

Principles of International Taxation	
Jurisdiction Options	
Australia	Ireland
Brazil	Malta
China	Singapore
Cyprus	United Kingdom
Hong Kong	United States
India	
Thematic Options	
Banking	EU VAT
Energy Resources	Transfer Pricing
EU Direct Tax	
Extended Essay on a Tax Specialization of Your Choice	



Recommended Modules

- 1. Principles of International Taxation**
- 2. Transfer Pricing**
- 3. Energy Resources**



Principles of International Taxation

- 1. It focuses on understanding, interpreting and applying Double Tax Treaties between the contracting states.**
- 2. It sets down the taxing rights of the two contracting states in respect of the different types of income of their residents.**

Sample Exam Paper:



Transfer Pricing

- 1. It focuses on the transactions between related parties.**
- 2. The objective is to determine if the transactions have been made “at market value”.**

Example Exam Paper:



Energy Resources

- 1. It focuses on the main types of the oil and gas exploitation contracts between the host state and the international oil company.**
- 2. It deals with numerous aspects of oil and gas industry with specific focus on tax impacts.**

Sample Exam Paper:



Exams and Results

- 1. The exams are held twice a year: one in **June** and one **December** every year.**
- 2. The results are published on the ADIT site in the middle of **August for June** exams and in the middle of **February for December** Exams.**
- 3. Individual results are sent to students by e-mails.**



ADIT is for me.
I want to register now!
Hurry up!
Hit when the iron is hot!

How can I register for ADIT?

1. You will have to register as an ADIT student first.

Registration is valid for 5 years. £235

2. You will have to register for each module long

enough before the exam time. £215

3. Visit this site for registration purposes:

www.tax.org.uk/adit/register





أشرف عبد الغنى
للخبرة الإستشارية

Exam preparation



GENEVA GROUP INTERNATIONAL

Teaching Modes

The following are the main teaching modes:

- 1. Lecturing**
- 2. Case studies**
- 3. Court cases**
- 4. Past exam papers (2016 – 2023)**



What are the study materials?

- 1. The course relies heavily on **Tolley study materials** which include study manuals, cases, revisions questions, past exam papers etc.**
- 2. There is a list of the recommended/text books that students can use during their study and refer to during the exams.**

How much time does each module require?

This depends on a number of factors:

- 1. The study time available for every individual candidate**
- 2. The level of English**
- 3. Familiarity with the subject matter of each module**
- 4. The learning style of every candidate.**



How much time does each module require?

Module	Units	Teaching	Revision	Total
Principles of International Taxation	36	120	90	210
Transfer Pricing	24	90	90	180
Energy Resources	18	75	75	150



أشرف عبد الغنى
للخبرة الإستشارية

Teaching Staff



GENEVA GROUP INTERNATIONAL



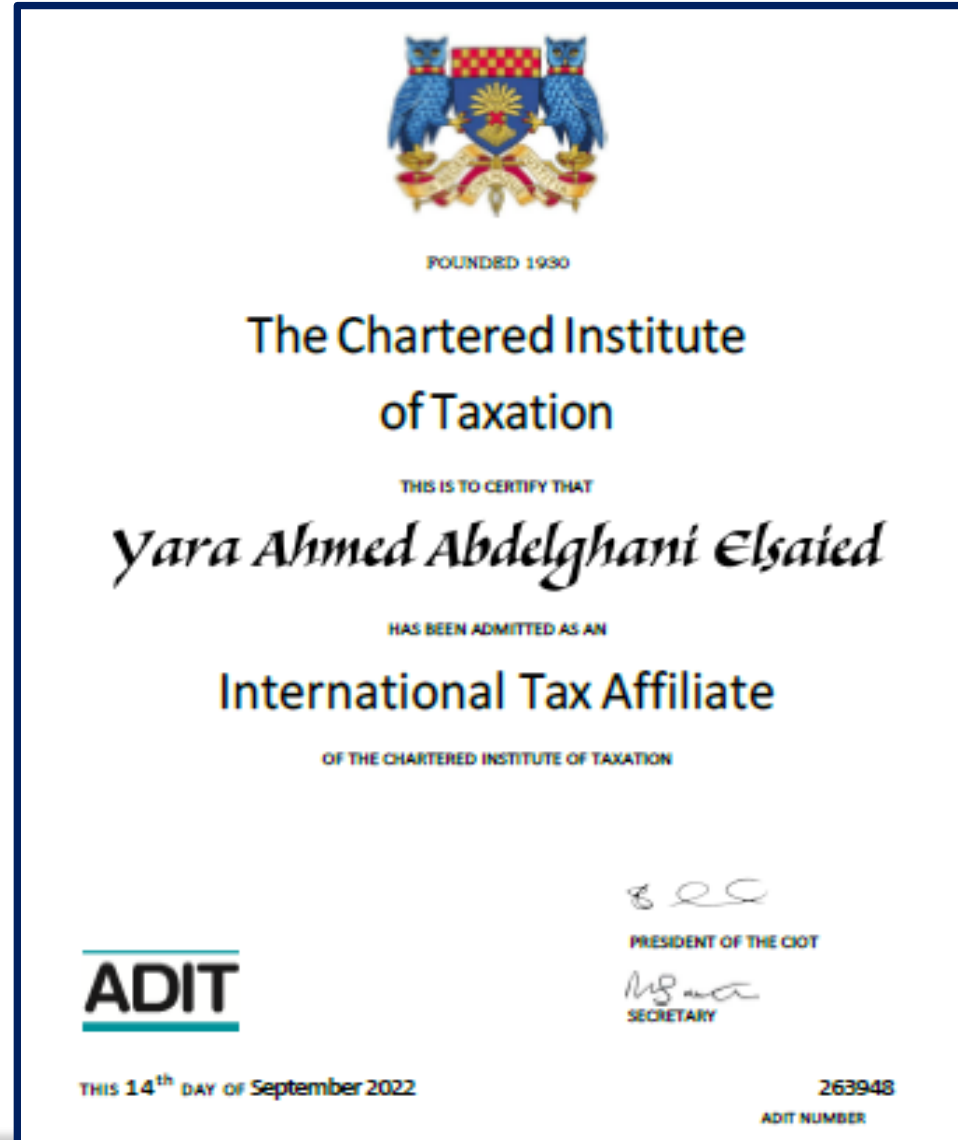
**Chairman Advisor for
International Taxation
and Training**

- 1. ADIT: Transfer Pricing Module**
- 2. EdD Doctor of Education, Leicester University, England**
- 3. Master of Science MSc in TESP, Aston University, England**
- 4. 6 years experience in legal and tax translation**
- 5. 8 years Teaching Experience, MSA University, 6th October**
- 6. 22 years Teaching and Supervisory Experience British Aerospace, Saudi Arabia.**

ATC ADIT International Tax Affiliates



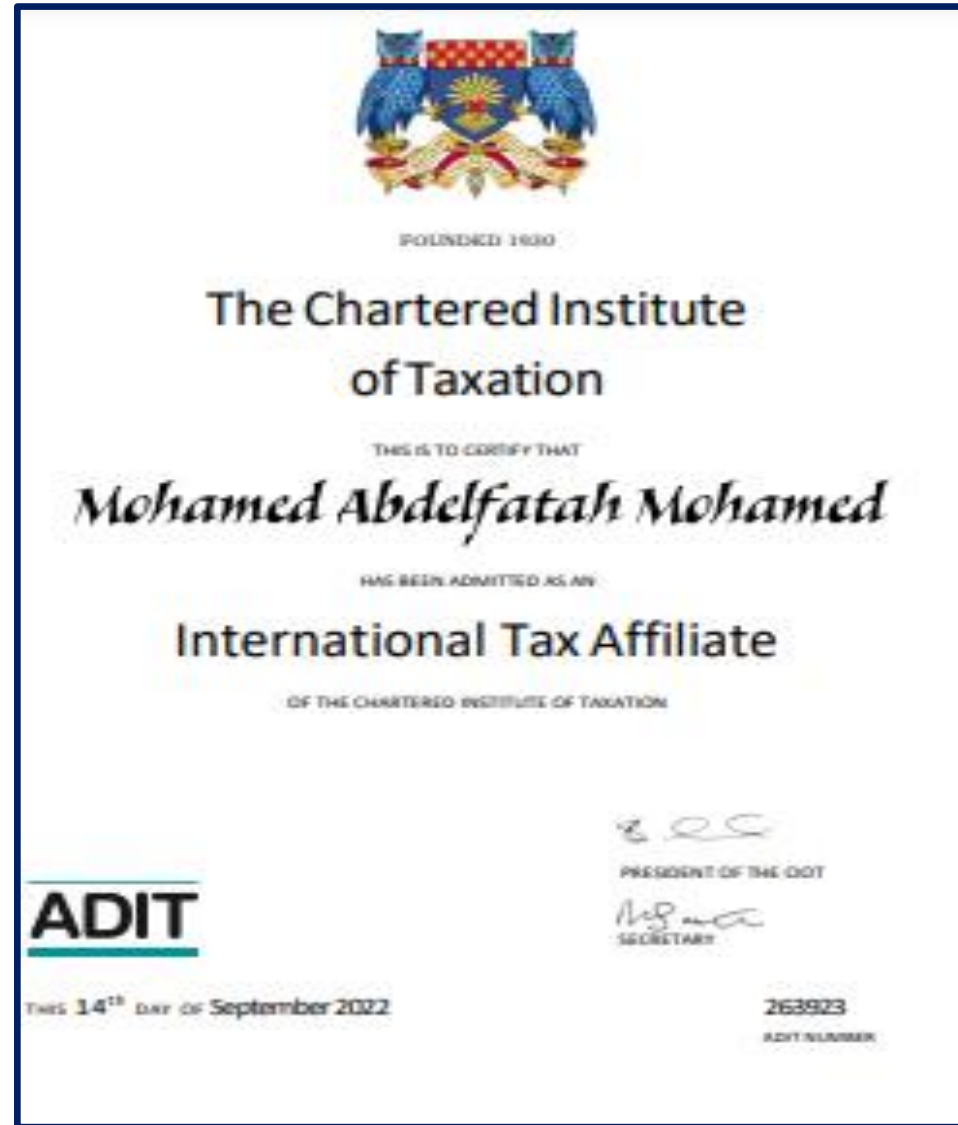
**Partner and Head of
International Tax**



ATC ADIT International Tax Affiliates



**Senior Associate Tax
Manager**





أشرف عبد الغنى
للخبرة الإستشارية

Questions



GENEVA GROUP INTERNATIONAL

Major Clients



Major Clients



Major Clients



HITACHI LTD

MITSUI&CO.LTD.



Major Clients



The Association of
Accountants and
Financial Professionals
in Business



Major Clients

ORASC  M

 **Al-Futtaim real estate**


شركة المصريين في الخارج للاستثمار والتنمية
Egyptians Abroad Investment & Development Co.


الأهلي للتنمية العقارية
AL AHLY FOR REAL ESTATE DEVELOPMENT


يوتوييا



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 **SWISS**

 **Lufthansa**

منازل للتطوير العقاري
MANAZEL REAL ESTATE DEVELOPMENTS
منازل

Major Clients



Major Clients

ATC
Ashraf Abdel Ghani



التجاري وفا بنك
Attijariwafa bank



Bank Audi



e-finance
Partner of Choice



Industrial Development & Workers Bank of Egypt
بنك التنمية الصناعية والعمال المصري



بنك بلوم مصر
BLOM BANK EGYPT

MISR IRAN DEVELOPMENT BANK



البنك الأهلي المتحد
ahli united bank

Major Clients

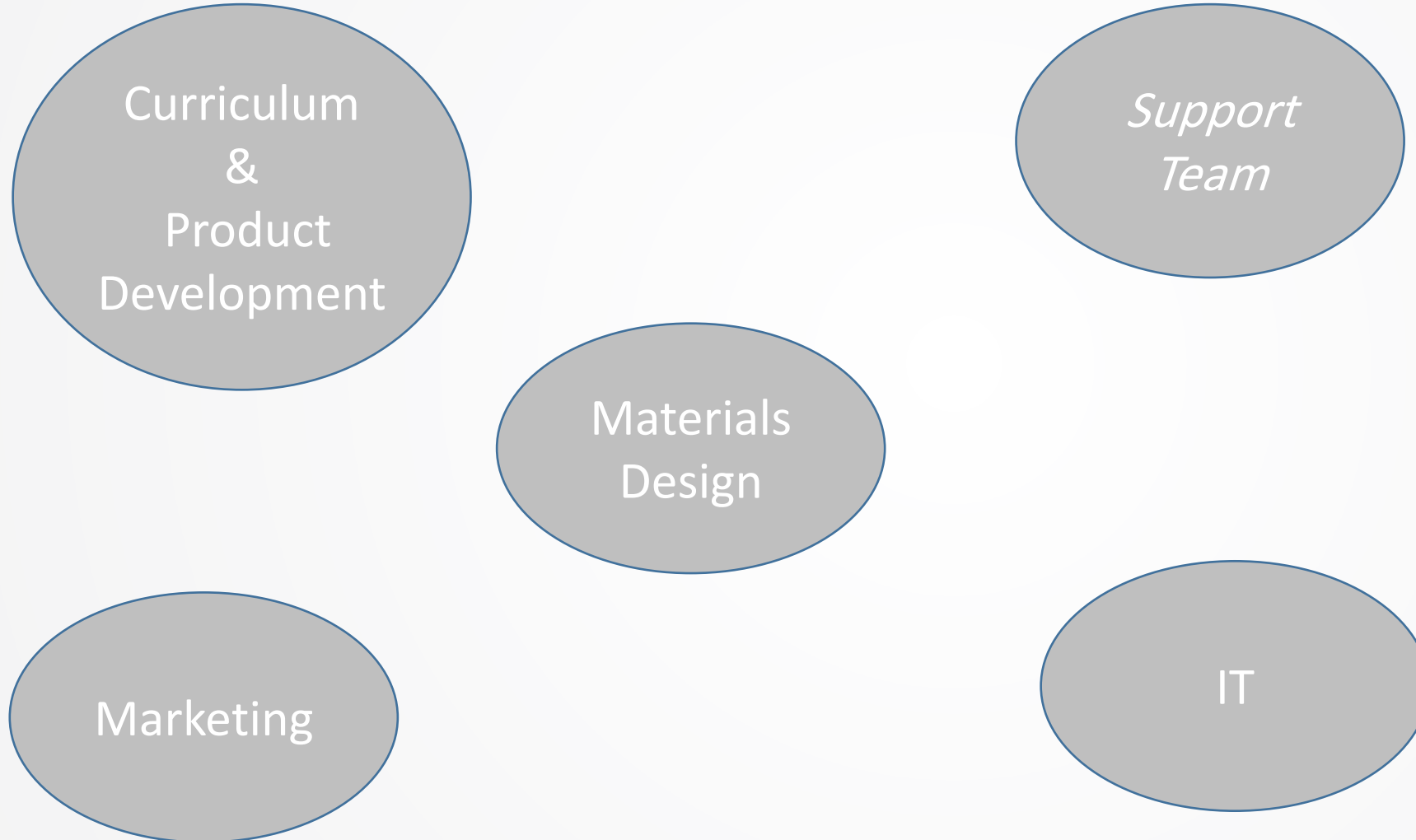


- Vision of Senior Partner : Mr. Ashraf Abdel Ghani
- Our slogan: “*Developing World-Class Professionals*”
- Unique set up and structure
- Large Investment
- Technology



**ATC Pro
Training**

Structure



ATC Pro Training

Competitive Advantage



- Highly Qualified Instructors
- Proven long-track and relevant experience
- Online & offline recovery..... *“Never Miss a Lecture”*
- **Free English & Math for professional certificates**
- Latest educational technology
- Online test bank (Mobile Version and PC Version)
- Pre-approved course provider by IMA (US)
- Partnership with Hock International (one of the most internationally recognized materials providers.



ATC Pro Training Instructors

Dr. Goma Ahmad Mosbah

- EdD Doctor of Education, England
- Master of Science in TESP, England
- ATC Chairman Advisor for Translation
- Transfer Pricing Certificate – CIOT, UK
- +40 years of proven practical experience in teaching:
- Business English, Financial English, Technical English, Linguistics, Translation, Academic Writing, TEFL
- International Conferences:
 1. TESOL International 1992, Vancouver, Canada.
 2. TESOL Arabia 2003, Dubai, United Arab Emirates.
 3. NILE TESOL Egypt 2014

ATC Pro Training

Instructors

Ms. Yara Abdel Ghani



- **MSc in Accounting**, Queen Mary University of London, UK
- **ADIT** holder
- **+10 years** in Accounting, Auditing and Taxation
- **Partner - International Taxation**
- Talented lecturer for ADIT, Accounting and Auditing domains
- Provided audit and international taxation services to a number of local and multinational companies

ATC Pro Training

Instructors

Mr. Mohamed Abdel Fattah

- B. Commerce, CMA
- **ADIT** holder
- **+20 years** in Accounting, local and International Taxation
- **Principal Director - International Taxation**
- Talented lecturer for ADIT and Accounting domains
- Provided local and international taxation services to a number of local and multinational companies

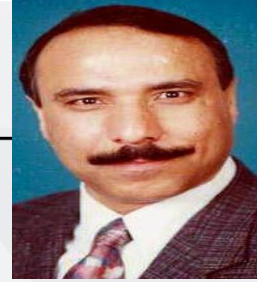
ATC Pro Training

Instructors

Dr. Mohamed Awadalla



- DBA, MBA, CPA, CIA, , FESAA
- B. Com + B. Education – English Section
- +30 years of proven practical experience in:
Financial Management, Accounting, Auditing, Due Diligence, Strategic Management and Risk Management
- IMA member
- Ex- CFO and member of board of directors
- EY / Saint-Gobain / Exxon-Mobil / Canex Alu / CPC



ATC Pro Training

Instructors

Dr. Samir Hassan

- CPA, CMA, CFM, CGMA, CITP, PhD
- +30 years of proven practical experience in:
Finance, Accounting, Auditing, Economics, Strategic management, Risk Management and Corporate Governance
- Ex - Board Member at ICMA Board of Regents (2009-2015)
- Lecturer at AUC/Al Ain Univ./Infomatics (Dubai)
- CAB/KPMG / Amer Group / Government of Dubai



CMA Profile: Dr. Samir M.A. Hassan



As a Ph.D. of Financial Economics, Dr. Samir M.A. Hassan knows the value of training and education. An Egyptian national with an illustrious career in the fields of capital markets, finance, auditing and accounting, Dr. Hassan earned his Ph.D. in 2005 from Ain Shams University, one of the top two universities in Egypt. At the time, Dr. Hassan was serving as an accounting and banking expert with the government of Dubai. Yet despite reaching the pinnacle of educational achievement, Dr. Hassan thought he could go even further. "As I always look to advance my professional skills – seeking perfection, if you will – I decided that after getting my Ph.D., I would start preparing to take my CMA®," he said.

Dr. Hassan earned his CMA (and later his CFM) certification in 2007 while working at the Dubai Financial Market. He served at that organization from 2006 until 2009, first as a senior advisor for risk management, compliance, finance, and audit, and then as vice president, internal audit.

For Dr. Hassan, the benefits he derived from becoming a CMA were clear and immediate, particularly in his role as auditor.

"I was able to use the knowledge I gained from preparing for the CMA to evaluate the decisions management made during an audit period. As an auditor, that CMA training helped me perform operational and performance audits for all managerial levels," he said.

Currently, Dr. Hassan serves as an accounting expert with the Abu Dhabi Judicial Department, and his CMA training continues to prove beneficial to his on-the-job performance. It also helps to impress his clients.

He explained: "The CMA credential is a spotlight directed to anyone working in accounting and finance. To be certified as a CMA means that I'm a more knowledgeable and experienced professional. In addition, the certification gives me more confidence and adds to my clients' trust, when they realize that they are dealing with a CMA."

Given his experience, it's not surprising that Dr. Hassan has developed into a strong proponent of the CMA certification. Since July 2009, he has been a member of the ICMA® Board of Regents, the body that oversees the content and strategic direction of the CMA exam. He shares his enthusiasm for the certification with his co-workers and has encouraged many of his peers to also pursue the certification.

"Being certified as a CMA and CFM has inspired a lot of my colleagues and subordinates in all of the organizations where I have worked," he said. "The CMA is very popular in the Middle East, especially in Egypt. In fact, Egypt ranks only behind the U.S. in the number of participants in the CMA program."

From his vantage point both as a practitioner and a Board of Regents member, Dr. Hassan recognizes that the recent changes to the CMA exam are only serving to attract a greater number of professionals to the designation. "It's obvious from the statistics that more accounting and finance professionals are choosing to pursue their CMA. I think that's because the revised program is more focused and eliminated some of the repetition of materials and content covered in other certifications." "The CMA program has become more useful and unique," he concluded. "It's helping to prepare a whole new generation of more specialized management accountants."

ATC Pro Training

Instructors

Mr. Mohamed Eissa



- CPA, MESAA
- +35 years of proven practical experience in:
Finance, Accounting, Auditing, Financial Planning and Risk Management
- AICPA Member
- Lecturer at AUC and other institutions
- Deloitte/KPMG / PwC/ Adidas

ATC Pro Training

Instructors

Dr. Mohsen El Gayyar



- MESAA, PhD
- +20 practical experience in finance, accounting and taxation
- IMA Member
- Approved instructor at tax authority, Ain Shams University, Arab Academy and many other organizations
- Official Media Speaker for Tax Authority
- Consultant to Finance Minister

ATC Pro Training

Instructors

Mr. Yehia Bakr

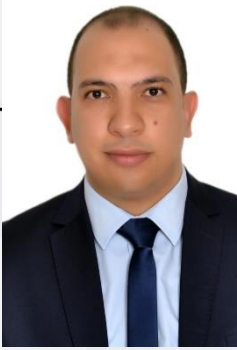


- CPA
- AICPA Member
- +20 years of practical experience in Accounting, Auditing and Taxation in USA
- Founder of NCS Tax Resolutions Services Firm in USA
- Highly talented lecturer for CPA

ATC Pro Training

Instructors

Mr. Nour El Din Ibrahim



- CMA, CIA
- **Internal Audit Manager**
- **IMA memebr**
- **+10 years** in internal audit, risk assessment, fraud investigation and internal control design
- Talented lecturer for CMA and CIA
- El Sweidi Group/KPMG/Peugeot Egypt/Al Jeraisy Group

ATC Pro Training

Instructors

Mr. Mohamed Amer



- CertIA, FMVA, CFC, CertIFR, MBA, CMA
- **CFA** in progress, **DBA** in progress
- **IMA** memebr
- **+11 years** Accounting, Financial Planning and Financial Analysis
- Talented lecturer for CMA and CFA
- Aswaq Misr/Lesaffre/Bavarian Auto/Universal/Red Sea Int'l/Connex

ATC Pro Training

Instructors

Mr. Mohamed Rizk



- CMA, ACCA
- IMA member
- **+16 years** in Accounting, Auditing and Taxation
- Talented lecturer for CMA, ACCA and IFRS
- Highly professional in Excel modelling
- PwC/BDO/Ahmed Essam & Co.

Why ATC ?

- Instructors having up to 30 years of high-level practical experience with multinationals and big 4 audit firms
- World-class professional who shared in initial implementation of IFRS in Europe
- Free “English for Professional Certificates ” Course
- The most modern education and training technology
- Never Miss a Lecture
- Rich case studies, examples from Egyptian, International and Multinational companies



Ashraf Abdel Ghani
Professional Education & Training

THANK YOU



Dokki Branch : 48 Giza St., 5th Floor,
Appt 52 , Giza
Heliopolis Branch : 20 Roshdy St., Saffir
- Heliopolis



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PROSPECTUS 2023

ADIT



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INTRODUCTION

It's never been a more exciting time to be a tax practitioner. In an ever more connected world, tax professionals have to stay on top of their game to take advantage of the challenges and opportunities that today's business offers. But how do you make sure you stand out?

Give yourself a clear advantage with ADIT

Students are welcomed from all parts of the world, and ADIT has been pursued in over 120 countries and in every continent around the globe. There are significant benefits in having a globally recognised qualification in international taxation and the ADIT exams, which are sat in English, also enable candidates across the world to demonstrate their ability in the language of international business.

ADIT is accredited by the Chartered Institute of Taxation (CIOT), one of the leading professional bodies in the United Kingdom dedicated to taxation ([see page 26](#)).

THE ADIT STRUCTURE

MANDATORY EXAM:	CHOOSE ANY TWO OPTIONS:	
PRINCIPLES OF INTERNATIONAL TAXATION	AUSTRALIA	HONG KONG
	BANKING	INDIA
	BRAZIL	IRELAND
	CHINA	MALTA
	CYPRUS	SINGAPORE
	ENERGY RESOURCES	TRANSFER PRICING
	EU DIRECT TAX	UNITED KINGDOM
	EU VAT	UNITED STATES
	EXTENDED ESSAY ON A TAX SPECIALISM OF YOUR CHOICE	

For more details about each module, visit www.tax.org.uk/adit/module-detail.

Extended essay

In place of one of the option exams, candidates may submit an extended essay consisting of 15,000 to 20,000 words on any aspect of international taxation (subject to approval).

Exams held twice a year

All modules are examined each **June**. The most popular modules are also examined in **December**.

Upon completion of ADIT

Holders of the ADIT qualification will receive an **ADIT qualification certificate** (see page 20), together with an invitation to an ADIT Awards Ceremony.

ADIT is a free-standing qualification which will not give the right to membership of the CIOT. However, ADIT holders may apply to become an **International Tax Affiliate of the CIOT** (see page 24) which will entitle them to use the designatory letters "ADIT" after their name.

ADIT holders who have passed the United Kingdom module will be able to apply for a credit for the Taxation of Major Corporates Advanced Technical exam of the CIOT's Chartered Tax Adviser (CTA) qualification.

Registration as an ADIT student

ADIT students are welcomed from all parts of the world, and the only pre-condition for registration is the possession of an email address.

New students should aim to be registered by 30 November if they wish to sit an exam the following June (and 31 May if they wish to sit an exam the following December). However, student registration will remain possible up to the beginning of March for students planning to sit exams in June, and the beginning of September for students planning to sit December exams. Entry for the exams is a separate procedure.

The ADIT Committee reserves the right to refuse or cancel any application for registration as a student without assigning any reason to the refusal or cancellation; a full refund of the student registration fee will be issued.

In the event that a student's situation changes significantly within a month from the date of application and the student no longer wishes to proceed, a refund can be made minus an administration charge. After this time, the registration fee is non-refundable.

Key dates and deadlines

The following dates apply to the June 2023 exam session:

- **31 October 2022** Exam entry opens
- **2 March 2023** Student registration deadline
- **16 March** Exam entry deadline (entries received after this date are subject to £100 late entry fee)
- **31 March** Closing date for late entries
- **6-8 June** Exams take place
- **17 August** Notification of results via email

The following dates apply to the December 2023 exam session:

- **28 April** Exam entry opens
- **1 September** Student registration deadline
- **15 September** Exam entry deadline (entries received after this date are subject to £100 late entry fee)
- **29 September** Closing date for late entries
- **12-14 December** Exams take place
- **22 February 2024** Notification of results via email

Fees

Student registration fee:	£235
Exam entry fee (per exam)*:	£215
Extended Essay registration fee:	£215

*Exam entries received during the late entry period will be subject to an additional £100 late fee.

Fees are correct at the time of publication; however ADIT fees are subject to annual review and may change over time.

Register today at
www.tax.org.uk/adit/register

ACADEMIC BOARD

The ADIT standard is supervised by an Academic Board of distinguished international tax practitioners. The Academic Board reflects the diverse ADIT community, with membership from a range of different countries and international tax backgrounds.

The following members comprise the Academic Board:

Prof. Philip Baker

University of Oxford

Prof. Rita de la Feria

University of Leeds

Malcolm Gammie

London School of Economics

Prof. Ruth Mason

University of Virginia

Prof. Zhu Qing 朱青

Renmin University of China 中国人民大学

Prof. Diane Ring

Boston College

Prof. Luís Eduardo Schoueri

University of São Paulo

Dr Partho Shome

Ministry of Finance, Government of India

Prof. Kees Van Raad

University of Leiden

Jefferson VanderWolk

Squire Patton Boggs

Prof. Richard Vann

University of Sydney

Academic Board meetings are chaired by:

Jim Robertson

UN Subcommittee on Extractive Industries
Taxation

120

Over 120 countries represented with ADIT people on every continent

35

Average student age is 35 years with many mid- to senior level professionals using it as a way of benchmarking their expertise

1,800

Over 1,600 firms and organisations employ ADIT professionals around the world



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ADIT is an essential qualification for international tax practitioners.

Joao Araujo ADIT
Lawyer, Telles de Abreu Advogados
Portugal

EXAM ENTRY AND INFORMATION

Exam entry

It is the responsibility of candidates to enter for ADIT exams. Key dates and deadlines can be found on [page 5](#). Exam entry should be made online via the ADIT website. Manual exam entry forms are available upon request, where students are unable to enter via the website. Employers registering and paying for several employees should contact the Education Team in advance.

All exam entries are normally acknowledged via email, within ten working days. Candidates should email or telephone if this is not received.

Exam entries arriving after the deadline cannot be guaranteed, and will be subject to an additional £100 late fee.

Online exams

To provide flexibility to ADIT exam candidates, ADIT exams are delivered online and can be sat anywhere in the world.

Sitting online exams, you'll use a purpose-built exam application, Exam4, on your laptop or desktop computer. You will be able to download Exam4 four weeks before your exam, and practice using it with a past ADIT exam paper.

On exam day, you will sit the exam at a location of your choice, such as your home or office.

When you complete your exam entry, we will still ask you to specify where you plan to sit your exams as this will determine your local start time. You will need to select your location from the list of cities on the exam entry form or, if your location is not listed, select 'Other' and email us at education@adit.org to let us know where you plan to sit your exams.

More information about online ADIT exams can be found on the website at: www.tax.org.uk/adit/managing-exams



Exam dates

Exams for the June 2023 session will take place on the following dates:

Tuesday 6 June

Principles of International Taxation

Wednesday 7 June

Jurisdiction modules

- 2.01 – Australia
- 2.02 – China
- 2.03 – Cyprus
- 2.04 – Hong Kong
- 2.05 – India
- 2.06 – Ireland
- 2.07 – Malta
- 2.08 – Singapore
- 2.09 – United Kingdom
- 2.10 – United States
- 2.11 – Brazil

Thursday 8 June

Thematic modules

- 3.01 – EU Direct Tax
- 3.02 – EU VAT
- 3.03 – Transfer Pricing
- 3.04 – Energy Resources
- 3.05 – Banking

Exams for the December 2023 session will take place on the following dates:

Tuesday 12 December

Principles of International Taxation

Wednesday 13 December

Jurisdiction modules

- 2.03 – Cyprus
- 2.09 – United Kingdom

Thursday 14 December

Thematic modules

- 3.01 – EU Direct Tax
- 3.02 – EU VAT
- 3.03 – Transfer Pricing
- 3.04 – Energy Resources

Withdrawal from the exams

The terms of our exam deferral and cancellation policy, including the fees which may apply, depend on the timing of the application for withdrawal and the reasons for the request.

Free deferral period

Candidates have until 14 days after the exam entry closing date (or 14 days after the late exam entry closing date for candidates who pay the late entry fee) to defer their exam entry to the next session.

Paid deferral period

Candidates have until 14 days before the exam session begins to carry forward 50% of the paid exam entry fee to their choice of session during the next twelve months.

Candidates who withdraw less than 14 days before the exam session begins forfeit the full fee.

Cancelling exam entries

Candidates can request to cancel their exam entries and claim a refund of the exam entry fee up to 14 days after the date they submitted the exam entry, subject to a £15 admin fee. The £100 late entry fee is not refundable.

After 14 days, exam entries can no longer be cancelled and exam entry fees are non-refundable.

If required, candidates may also apply for emergency deferral.

More information about exam withdrawal and deferral can be found on the website at: www.tax.org.uk/adit/withdrawal

THE ADIT MODULES

Format

ADIT is assessed in a modular format and is awarded when all required modules have been completed. If a candidate passes any of the ADIT modules, the pass will remain valid for the next five years. If the entire qualification is not completed within five years then the candidate may re-register as an ADIT student but will have to resit any modules for which the pass has expired.

To achieve the ADIT qualification, candidates are required to complete three modules: the mandatory Principles of International Taxation exam, and any two modules from the range of optional exam modules (although an extended essay may be completed in place of one of these exams). Further details can be found on [page 17](#).

Candidates may enter to sit exams for up to three modules in a single exam session, or attempt the modules in separate exam sessions, one at a time.

International tax practitioners are expected to be able to apply their skills to multiple tax regimes and areas, and candidates may demonstrate this ability by selecting any two of the available exam options within the Jurisdiction and Thematic categories.

Jurisdiction modules are designed to test candidates' detailed knowledge of a tax jurisdiction. Thematic modules are designed to test a detailed knowledge of international tax issues in a specific area of taxation.

Sitting ADIT exams

All ADIT exams are available to sit online via our purpose-built Exam4 application.

The Exam4 app is used by a number of leading universities and institutions across Europe and North America. Used by thousands of students since we introduced it in 2014, it has a proven track record for reliability and student satisfaction: ADIT candidates who have used it say their experience has been very positive.

Candidates can use Exam4 on a wide range of laptop and desktop computers; it does not require the latest technology. Candidates only need to be connected to the internet when launching the exam and when submitting their answers at the end, so a stable internet connection isn't essential.

Full information about online exams can be found on the website at:

www.tax.org.uk/adit/managing-exams

View the full syllabus at
www.tax.org.uk/adit/module-detail

PRINCIPLES OF INTERNATIONAL TAXATION

Exam length: 3 hours 15 minutes

This module is based on the OECD Model Convention, and is compulsory for all candidates. The focus is on key issues such as Principles of International Tax Law, Residence, Double Taxation Conventions and Treaty interpretation, transfer pricing, the work of the OECD and international tax avoidance. See the [Syllabus](#) for full details.

Candidates who pass this exam are eligible to apply for a standalone certificate. More information can be found on [page 20](#).

The exam consists of two parts. Part A consists of five essay-type questions worth 25 marks each. Part B consists of two scenario-type questions worth 25 marks each. Candidates are required to answer four questions in total, including at least one question from each part.

This exam is offered in the **June** and **December** exam sessions.



JURISDICTION MODULES

Exam length: 3 hours 15 minutes

Candidates are expected to have detailed knowledge of a country's tax regime regarding international tax matters.

See the [Syllabus](#) for full details of each module.

Candidates who pass a Jurisdiction exam are eligible to apply for a standalone certificate, while candidates who have passed both a Jurisdiction exam and Principles of International Taxation are eligible to apply for a modular certificate. More information can be found on [page 20](#).

Available in the following optional modules:

2.01 – Australia

This module covers the structure of the Australian tax system with particular emphasis on Income Tax, Fringe Benefits Tax and Goods and Services Tax.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.02 – China

This module covers the structure of the Chinese tax system with particular emphasis on Individual Income Tax, Enterprise Income Tax, and inbound and outbound investment taxes.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.03 – Cyprus

This module covers the Cypriot tax system with particular emphasis on Income Tax, Capital Gains Tax and Value Added Tax, double tax treaties, reorganisations and BEPS.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

In 2023, this exam is offered in the **June** and **December** exam sessions. After 2023, this exam will only be offered in the **June** exam session.

2.04 – Hong Kong

This module covers Hong Kong income taxes with particular focus on international trading, and includes various taxpayer categories, tax administration, double tax relief and tax planning.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.05 – India

This module covers the structure of the Indian taxation system with particular emphasis on income tax (including income tax on capital gains) and wealth tax, and addresses tax jurisdiction (including territoriality), taxation of individuals, taxation of companies, tax planning, use of tax treaties, tax procedures, withholding taxes, and tax administration.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of five questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.06 – Ireland

This module covers the Irish personal, corporate and indirect taxes in an international context. It also covers double tax relief, reorganisations, transfer pricing, cross border issues and anti-avoidance.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.07 – Malta

This module covers the structure of the Maltese tax system with particular emphasis on Income Tax, Income Tax on capital gains, Property Transfer Tax, Duty on Documents and Transfers, and VAT.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.08 – Singapore

This module covers the main tax issues typically encountered by individuals and global businesses operating in a territorial-based taxation economy that is highly dependent on international trade. The topics serve to highlight tax planning opportunities in cross border activities. GST planning is being seen as a vital tool in shaping corporate competitiveness as the state increases its dependence on it as a stable source of tax revenue.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.09 – United Kingdom

This module covers areas such as UK CFC legislation, double tax relief, thin capitalisation, reorganisations, transfer pricing, application of corporation tax to cross-border situations and anti-avoidance provisions.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of five questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** and **December** exam sessions.

2.10 – United States

This module covers in detail the federal income tax, with particular emphasis on inbound and outbound cross-border situations, US tax treaties, transfer pricing and cross-border mergers and acquisitions. It also covers the basic rules of, and cross-border issues in, the federal estate tax, the federal gift tax, and state and local taxes.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

2.11 – Brazil

This module covers the international tax aspects of the Brazilian tax regime, with particular focus on the concept of tax jurisdiction and the territoriality principle, the taxation of individuals, companies and non-residents, tax planning, and Brazil's tax treaty network.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session. The June 2023 exam session will be the final sitting of this exam.

THEMATIC MODULES

Exam length: 3 hours 15 minutes

Candidates are expected to have a detailed knowledge of international tax issues concerning a specific area of taxation, or a transnational grouping such as the EU, and should be able to answer questions on international tax in relation to the chosen subject. This may require awareness of multiple countries' tax systems, to the extent that those systems interact with the chosen area of taxation.

See the [Syllabus](#) for full details of each module.

Candidates who pass a Thematic exam are eligible to apply for a standalone certificate for the completed optional module. Candidates who have passed both a Thematic exam and Principles of International Taxation are eligible to apply for a modular certificate.

More information about standalone and modular certificates can be found on [page 20](#).

Available in the following optional modules:

3.01 – EU Direct Tax option

This module examines the impact of European Union Law on all aspects of direct taxation for all Member States. The module includes the background to EU Law in the Treaties, and the role of the various EU institutions.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** and **December** exam sessions.

3.02 – EU VAT option

This module examines the European Union Law on Value Added Tax (VAT) which governs the VAT system in all Member States. The module includes the fundamental concepts of EU Law, the provisions of the Principal VAT Directive and other EU VAT legislation, and the application of EU Law by the Court of Justice in decided cases.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** and **December** exam sessions.

3.03 – Transfer Pricing option

This module covers the fundamentals of transfer pricing based on the OECD model. The module will focus on transfer pricing methods, the arm's length principle, comparability, compliance issues and avoiding double taxation and dispute resolution.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of five questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** and **December** exam sessions.

3.04 – Energy Resources option

This module examines the taxation of energy resources such as oil and gas in an international context.

The module addresses fundamental tax issues within the oil and gas sector, including a number of country examples, permanent establishments and transfer pricing methods, the taxation of intellectual property, mergers and acquisitions, financing and trading activities, and carbon pricing.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** and **December** exam sessions.

3.05 – Banking option

This module covers investment banking, capital markets, global markets, asset financing, asset management, private banking and wealth management. There is a requirement to be aware of the Regulatory Framework and the Basel Agreements. The securities markets of France, Germany, Hong Kong (including China Connect), Italy, Japan, South Korea, Switzerland, the United Kingdom and the United States will be considered. Knowledge of Luxembourg as a global centre for investment funds is also required.

The exam consists of three parts. Part A consists of two mandatory questions worth 25 marks each. Part B consists of two questions worth 20 marks each, of which candidates are required to answer one. Part C consists of four questions worth 15 marks each, of which candidates are required to answer any two.

This exam is offered in the **June** exam session.

EXTENDED ESSAY OPTION

In place of one exam module

Candidates have the option of writing an extended essay (effectively a dissertation or thesis), as an alternative to one Jurisdiction or Thematic exam module. The tax jurisdiction or area covered by the extended essay must differ from that of the exam selected by the candidate for the remaining option module.

The extended essay must be between 15,000 and 20,000 words and must focus on international taxation.

If a candidate wishes to submit an extended essay instead of a Jurisdiction exam, the topic of the extended essay should relate to some aspect of international tax primarily concerning one or more tax jurisdiction.

If a candidate wishes to submit an extended essay instead of a Thematic exam, the topic of the extended essay should relate to some aspect of international tax as it affects a specific sector, area of taxation, or transnational grouping such as the EU.

Prior to commencing work on an extended essay, candidates must have an extended essay proposal form approved. The extended essay must be submitted within three years of approval being given.

Full guidance notes are included in the [Syllabus](#).

Find out more at
www.tax.org.uk/adit/extended-essay

FURTHER INFORMATION

Permitted books

Candidates are allowed to use certain texts as reference materials during each ADIT exam. A full list of permitted books for each ADIT exam can be found in the [Syllabus](#). Permitted books can also be found on the website at:

www.tax.org.uk/adit/permitted-books

Candidates are reminded that the permitted texts should be used as reference materials only. Marks are not awarded for reciting or paraphrasing sections of text, but for analysis and understanding of the issues presented in each question.

Candidates are expected to bring original books, bound by the publisher. Self-printed copies are not ordinarily permitted, and require individual, written dispensation from the CIOT no less than 48 hours before the first exam of the session.

Candidates may underline words and sentences, sideline (to highlight edges of the pages when the book is fully closed), and highlight words and sentences, in the permitted texts.

Candidates are permitted to tag or fold pages in the permitted books. However, annotation and the use of post-it notes is not allowed.

Candidates are encouraged to use the latest available editions of the permitted texts; however older editions will also be permitted, provided they adhere to the regulations regarding permitted texts. Please note that such editions will not include more recent legislation.

All exams are set assuming the candidate has the most recent edition indicated in the [Syllabus](#).

No other written material will be permitted.

Candidates are expected to be aware of the standard of questions set in the ADIT exams.

For queries relating to the permitted text regulations, candidates should contact the Education Team at education@adit.org.

Exam results

Under ordinary circumstances, results will be issued approximately ten weeks following the date of the exam and approximately four months after the submission of an extended essay.

Exam results publication dates for ADIT exams taking place in 2023 can be found on [page 5](#).

STUDENT RESOURCES

Past papers, suggested answers and Examiners' reports for previous ADIT exams can be accessed from the ADIT website at:

www.tax.org.uk/adit/past-papers

All ADIT students are advised to refer to past papers, suggested solutions and candidates' answers for each module selected, as these can be used to provide an idea of the types of questions to be answered in an ADIT exam, and the standard of answer required.

In addition, the following resources are available to all ADIT students and Affiliates to assist with study towards the exams, research towards an ADIT extended essay, or any other research or professional development:

CIOT Library

The Library is housed as part of the law collection of King's College London, located on Chancery Lane in central London. For further information visit the Library webpage at:

www.tax.org.uk/library

IBFD Library

The IBFD offer a comprehensive public library service. More information can be found on the IBFD Library website at:

www.ibfd.org/library-services

The IBFD Library also hosts some of the most successful ADIT extended essays as part of its Dissertations and Theses Collection.

View the full list at

www.tax.org.uk/adit/student-resources

CERTIFICATES AND AWARDS

Certificates

After successfully completing the ADIT qualification, candidates will receive an ADIT qualification certificate together with an invitation to an ADIT Awards Ceremony.

Modular certificates are also available for candidates who have completed both Principles of International Taxation **and** any one of the option modules. Candidates will need to apply for certificates via the website after they have passed both modules. There is a fee of £60* for the modular certificate.

Candidates who have passed **either** the Principles of International Taxation **or** any one of the option

modules may apply for a standalone certificate recognising achievement of that module only. Candidates will need to apply for certificates via the website after they have passed the module. There is a fee of £60* for each standalone certificate.

* The fee for modular and standalone certificates includes courier delivery. Fees are correct at time of publication. ADIT fees are subject to annual review and may change over time.

For more information about modular and standalone certificates, visit:

www.tax.org.uk/adit/certificates

Medals and prizes

The following medals and prize will be available at the discretion of the ADIT Academic Board for exam papers of a suitable standard:

- The **Heather Self Medal** for the best overall performance in Principles of International Taxation.
- The **Raymond Kelly Medal** for the best overall performance in the United Kingdom module.
- The **Tom O'Shea Prize** for the best overall performance in the EU Direct Tax module.
- The **Croner-i Prize** for the best overall performance in the Transfer Pricing module.
- The **Wood Mackenzie Prize** for the best overall performance in the Energy Resources module.
- The **Worshipful Company of Tax Advisers Prize** for the best overall performance in the remaining Thematic modules.



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In pursuing ADIT, I have been able to acquire an understanding of the structure of treaties which enhances my professional expertise. The syllabus includes a strong corporate focus, and has proved highly relevant to my day-to-day work at EDF, whilst the freedom to select a second jurisdiction module enables me to develop my expertise across multiple tax systems

Karen Fisher CTA ADIT
Senior Tax Manager, EDF
United Kingdom

**Recipient of the June 2014
Raymond Kelly Medal**

COURSE PROVIDERS

ADIT-relevant tuition and training is available around the world, via a wide range of academic institutions, commercial training organisations and course providers.

The course providers offer a variety of distance learning, classroom options and revision courses. The courses which they offer can be an ideal way of enhancing your ADIT exam preparation, or simply supplementing your understanding of an international tax topic.

Study options

ADIT courses, training and materials are provided by a range of academic institutions, commercial training organisations and course providers:

- **ADIT-specific** – courses specifically designed to prepare students for the ADIT exams
- **Online or distance learning** – webinars, materials and support from a course provider but no classroom attendance required
- **In-house training** – the course provider comes to your organisation
- **Classroom courses** – provided by other professional bodies, commercial tuition providers, and academic institutions, for their purposes, which help in preparing for the ADIT exams
- **Self study** – our detailed syllabuses, recommended reading lists and past papers are supplied online and can be used as a guide to prepare for the examinations

All courses are offered independently of the CIOT. Courses do not include ADIT exam entry; exam entry enquiries and bookings must be made directly to the CIOT. Course enquiries, bookings and payments should be directed to the course provider.

Please note that the CIOT does not control or supervise any of these courses and is in no way responsible for their content or conduct.

Find your course provider at
www.tax.org.uk/adit/course-providers



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Coming from an accountancy background, I found that, in pursuing ADIT alongside an LL.M., I was able to benefit from a syllabus that enabled me to study for both qualifications simultaneously, and obtain both academic and professional certification within my chosen international tax subjects.

Cora Cheung ADIT
Senior Relationship Manager, Amicorp
Netherlands

INTERNATIONAL TAX AFFILIATE

Demonstrate your commitment, technical expertise and employability by becoming an International Tax Affiliate of the CIOT upon successful completion of ADIT.

ADIT is the leading qualification of its type for international tax professionals, and it is valued by firms and organisations in industries and sectors across the world. By becoming an Affiliate, you will enjoy a number of benefits, all of which contribute to increasing your global recognition.

Benefits

Professional identity – acquire the status and esteem that comes with affiliation to a premier professional body dedicated to taxation, and receive the bespoke Affiliate certificate and badge recognising your status within the CIOT.

Demonstrate expertise – join our online Find an Affiliate directory at:
www.tax.org.uk/adit/find-an-affiliate

Recognition in the field – contribute articles to the monthly journal, *Tax Adviser*, speak at international tax events, or become a virtual member of a CIOT Technical Sub-Committee

Global community – join one of our Champion-led ADIT networks, giving you access to technical and social activities with like-minded professionals in your area

Resources – enjoy discounted entry to our Conferences and free access to ADIT webinars, *Tax Adviser* (www.taxadvisermagazine.com) and the CCH weekly email news service. Gain access to the Library at King's College in London

Ethics and standards

The CIOT provides a Code of Conduct, a framework of ethical and best practice standards that you will promote as an Affiliate. Meanwhile, a range of CPD/CPE opportunities keep you up-to-date with international tax issues.

How do I become an Affiliate?

- Register as a student
- Successfully achieve ADIT by completing three modules
- Submit the application form to become an International Tax Affiliate
- Meet the annual CPD requirement for Affiliates

Fees

Affiliate subscription fees for 2023 are:

- Annual subscription fee: **£188**
- First year (if joining on or after 1 July): **£94**

Fees are correct at the time of publication; however ADIT fees are subject to annual review and may change over time.

Find out more at
www.tax.org.uk/adit/affiliate



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By successfully completing ADIT I was able to gain the confidence to apply this technical knowledge of important topics affecting my clients. My success, first as an ADIT student and now as an International Tax Affiliate, has not only assisted my self-development, but has helped me to gain significant recognition as an international tax practitioner

Quang Tran-Trung Phan ADIT
TP Associate Director, Grant Thornton
Malaysia

**International Tax Affiliate of the
Chartered Institute of Taxation**

CHARTERED INSTITUTE OF TAXATION

About the CIOT

The Chartered Institute of Taxation (CIOT) is the leading professional body in the United Kingdom concerned solely with taxation. The CIOT is an educational charity, promoting education and study of the administration and practice of taxation. One of our key aims is to work for a better, more efficient, tax system for all affected by it – taxpayers, their advisers and the authorities. The CIOT's work covers all aspects of taxation, including direct and indirect taxes and duties. Through our Low Incomes Tax Reform Group (LITRG), the CIOT has a particular focus on improving the tax system, including tax credits and benefits, for the unrepresented taxpayer.

The CIOT draws on our members' experience in private practice, commerce and industry, government and academia to improve tax administration and propose and explain how tax policy objectives can most effectively be achieved. We also link to, and draw on, similar leading professional tax bodies in other countries. The CIOT's comments and recommendations on tax issues are made in line with our charitable objectives: we are politically neutral in our work.

The CIOT's 19,000 members have the practising title of 'Chartered Tax Adviser' and the designatory letters 'CTA', to represent the leading tax qualification.

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SYLLABUS 2023

ADIT



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INTRODUCTION

In order to achieve this qualification, candidates will need to possess a broad knowledge right across the spectrum of international taxation, preferably informed by experience.

This document contains the detailed syllabus for each available module, together with recommended reading lists. Permitted texts for each exam are indicated in the recommended reading lists, and can be found on our website at www.tax.org.uk/adit/permitted-books.

Questions **will not** be set which require knowledge of any law or regulation, or any Statutory Instrument, EU directive or similar legal provision announced less than six months before the date of an exam, or on any tax or legal court case reported less than six months before the exam date. Nonetheless, all ADIT exam candidates are expected to maintain a general understanding of recent, significant legislative changes relevant to their exam subjects.

Each syllabus contains a list of topics included, together with an indication of the level of knowledge that a candidate may be required to demonstrate.

SYLLABUS GUIDE

Each syllabus includes guides which are intended to give candidates broad guidance on the approximate proportion of marks available for the major areas within the syllabus for each module.

The levels specified are:

Level 1

Candidates will be expected to have a broad understanding and awareness of the topic, but will not be required to provide answers in detail on these topics.

Level 2

Candidates will be expected to have a detailed knowledge of the topic and be able to apply this knowledge in both written and computational situations (where appropriate), showing an understanding of the issues involved.

Level 3

Candidates may be required to demonstrate an advanced knowledge, involving interpretive exposition and analysis, with the ability to comment upon problems arising and to suggest possible solutions in novel situations.

Candidates are expected to have an awareness of current accounting issues relevant to tax.

MODULE 1 - PRINCIPLES OF INTERNATIONAL TAXATION

I	Basic principles of international taxation	20%
II	Double taxation conventions (DTCs), focusing on the current version of the OECD Model Tax Convention (MTC)	30%
III	Transfer pricing and restrictions on interest deductibility	20%
IV	International tax avoidance	25%
V	Miscellaneous topics	5%

I Basic principles of international taxation

A	Jurisdiction to tax, including limits to tax jurisdiction arising from public international law, and cross-border enforcement of taxes	1
B	Taxes and tax systems	
	1. Definition and classification of taxes	1
	2. Federal systems and local-level taxes	1
C	State practice in exercising tax jurisdiction	
	1. Concepts of source and situs; use of residence, domicile and citizenship as connecting factors	2
	2. State practice in determining residence of individuals and corporations	2
	3. Implications of the use of citizenship as a connecting factor (especially particular issues for US citizens)	1
	4. State practice in determining the source of income and gains	2
	5. Tax issues arising from a change of residence/citizenship	2
D	Causes of international double taxation	
	1. Conflicts of residence and source	2
	2. Conflicting definitions of connecting factors	2
	3. Other causes of international double taxation (including particular issues for using citizenship as a connecting factor for taxation)	1
E	Methods of relief from international double taxation	
	1. Relief by credit – including indirect/underlying credit and tax sparing credit	3
	2. Relief by exemption – including participation exemption	3
	3. Practical difficulties in applying relief by credit and relief by exemption	3
	4. Relief by exemption and relief by credit compared: capital import neutrality vs. capital export neutrality	2
	5. Other methods of relief from international double taxation – relief by deduction of foreign tax; relief by deferral	2
F	Private international law and tax	
	1. Recognition of foreign legal entities	2
	2. Characterisation of entities as transparent or opaque – state practice	2
	3. The issue of qualification and international tax	2
G	The history of international tax law	
	1. Work under the League of Nations	1
	2. Work of the G20 and OECD	2
	3. Work of the UN Group of Experts	2
H	European Union law and international tax	
	1. EU law and double taxation conventions	2
I	Tax and international human rights instruments	
	1. The European Convention on Human Rights	2
	2. The International Covenant on Civil and Political Rights	2
J	State responsibility in international tax – the development of the concept of harmful tax competition	2

II Double taxation conventions (DTCs), focusing on the current version of the OECD Model Tax Convention (MTC)

Candidates are expected to: understand the operation of the provisions of the OECD MTC; show awareness of the major points in the Commentary to the relevant Article of the OECD MTC; and be aware of key reports of the OECD Committee on Fiscal Affairs and major international cases on the topic.

A	Types of DTCs (limited, multilateral etc.) and negotiation of DTCs	2
B	DTCs and domestic law	
	1. Incorporation of DTCs into domestic law	3
	2. Treaty override	3
C	Format and structure of a DTC	
	1. The OECD Model Tax Convention (OECD MTC) and the Commentaries to the OECD MTC – the work of the OECD Committee on Fiscal Affairs	3
	2. The UN Model Double Taxation Convention 2021 (UN MTC)	3
	3. Specific states' models: the US MTC; the Dutch MTC	1
	4. The Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS (MLI)	3
D	Approach to the application of a DTC: applying a DTC to a concrete scenario	3
E	Interpretation of DTCs	
	1. General approach to interpretation	3
	2. Vienna Convention on the Law of Treaties	3
	3. Use of external aids for interpretation – the status and use of the OECD Commentaries	3
	4. Application of Article 3(2), OECD MTC	3
	5. Resolving interpretation issues by competent authority proceedings – Article 25(3), OECD MTC	3
F	Provisions relating to the scope of a DTC: Articles. 1, 2, 29, 30, 31 and 32	
	1. Article 1: Persons covered	3
	2. Article 2: Taxes covered	3
	3. Article 29: Entitlement to benefits	3
	4. Articles 30, 31 and 32: Territorial extension, entry into force and termination	2
G	Key definitional provisions	
	1. Meaning of “resident” and resolution of cases of dual residence – Article 4, OECD MTC	3
	2. Permanent establishment concept: determining the existence of a permanent establishment – Article 5, OECD MTC	3
	3. BEPS Action 7: Preventing the artificial avoidance of a permanent establishment	3
H	DTC provisions relating to businesses	
	1. Business profits (with or without a permanent establishment) – Article 7, OECD MTC	3
	2. Shipping and air transport profits – Article 8, OECD MTC	3
	3. Associated enterprises – Article 9, OECD MTC: status of Article 9 and link to transfer pricing legislation	3
I	DTC provisions relating to individuals	
	1. Employment income – Article 15, OECD MTC	3
	2. Directors' fees – Article 16, OECD MTC	3
	3. Entertainers and sportspersons – Article 17, OECD MTC	3
	4. Pensions – Article 18, OECD MTC	2
	5. Government service – Article 19, OECD MTC	3
	6. Students – Article 20, OECD MTC	3
J	DTC provisions relating to investment income and gains	
	1. Income from land – Article 6, OECD MTC	3
	2. Dividends – Article 10, OECD MTC (including some consideration of the forms of dividend article used by key states, e.g. US, UK, France, Germany)	3
	3. Interest – Article 11, OECD MTC	3
	4. Royalties – Article 12, OECD MTC	3
	5. Capital gains – Article 13, OECD MTC	3
K	Relevance of the “other income” Article – Article 21, OECD MTC	3

L	Limitation of benefit provisions	
	1. Approaches to the misuse of DTCs	3
	2. Abuse of law doctrines and DTCs	3
	3. State practice with respect to limitation of benefit provisions	3
	4. BEPS Action 6: treaty abuse	3
	5. Articles 1 and 29: persons covered and entitlement to benefits	3
M	Methods of elimination of double taxation – Articles 23A and 23B, OECD MTC	3
N	The impact of the non-discrimination article – Article 24, OECD MTC	3
O	The resolution of disputes under DTCs	
	1. Competent authority/mutual agreement procedures – Article 25, OECD MTC	2
	2. Alternative means of resolving international tax disputes	2
	3. BEPS Action 14: Making dispute resolution mechanisms more effective	2
	4. BEPS Action 15: Developing a multilateral instrument to modify bilateral tax treaties	2
P	The application of DTCs to electronic commerce	
	1. The work of the OECD Taxation Advisory Group	1
	2. E-commerce and permanent establishments	1
Q	The digital economy	
	1. BEPS Action 1: Tax challenges of the digital economy	3
	2. VAT/GST issues	2
	3. Nexus issues	2
	4. Definition of permanent establishments	3
R	The work of the Platform for Collaboration on Tax	2
S	The work of the UN Committee of Experts on International Cooperation in Tax Matters	2

III Transfer pricing and restrictions on interest deductibility

A	Various approaches to the determination of profits of branches and associated enterprises	
	1. Unitary taxation/global formulary apportionment	2
	2. Arm's length approaches	3
B	State practice with respect to transfer pricing	
	1. Consideration of examples of domestic transfer pricing legislation (US, UK, Germany, Australia)	2
C	Transfer pricing and DTCs – Article 9, OECD MTC	3
D	Advanced pricing agreements	3
E	OECD Transfer Pricing Guidelines	
	1. Background to the introduction of the 2022 Guidelines	3
	2. Amendments to the 1995 and 2017 Guidelines	3
	3. Transfer pricing methodologies	3
	4. Special topics: Hard to value intangibles; low value adding intra-group services; cost contribution/sharing agreements; revised safe harbour guidance; documentation	3
	5. Resolution of transfer pricing disputes and advance pricing agreements (APAs)	3
	6. Attribution of profits to permanent establishments	3
F	Transfer pricing and BEPS	
	1. Awareness of the impact of BEPS on transfer pricing	3
	2. BEPS Actions 8-10: Aligning transfer pricing outcomes with value creation	3
	3. BEPS Action 13: Documentation and country-by-country reporting	3
G	Transfer pricing and developing countries	
	1. The UN Practical Manual on Transfer Pricing for Developing Countries 2021	3
H	State practice with respect to restrictions on interest deductibility (including thin capitalisation rules)	
	1. Consideration of examples of thin capitalisation legislation (US, UK, Germany)	3
I	DTCs and restrictions on interest deductibility	
	1. BEPS Action 4: Interest Deductions	3

IV International tax avoidance

A	Harmful tax practices	
1.	Work of the OECD Forum on Harmful Tax Practices	3
2.	Approaches to identification of harmful tax practices, including preferential regimes and substantial activity requirements	3
B	Domestic law approaches to international tax avoidance	
1.	CFC and other controlled foreign entity legislation – examples from state practice	2
2.	Foreign personal holding company legislation – examples from state practice	2
3.	CFC and equivalent legislation and DTCs	2
C	Money-laundering legislation and international tax avoidance	
1.	Application of money-laundering legislation to foreign fiscal offences	1
D	Co-operation between revenue authorities	
1.	Exchange of information – Article 26, OECD MTC	3
2.	Tax information exchange agreement	3
3.	Joint investigations of taxpayers	1
4.	Co-operation in the enforcement of tax liabilities/assistance in the collection of taxes – Article 27, OECD MTC	3
E	Conventions for administrative assistance in tax administration	
1.	The OECD/Council of Europe Convention	1
2.	Regional arrangements for cooperation in tax administration	1
F	Base Erosion and Profit Shifting (BEPS)	
1.	Awareness of the scope and details of the OECD BEPS Project	3
2.	Overview of all BEPS actions (1-15)	2
3.	BEPS Action 2: Hybrid mismatches	3
4.	BEPS Action 3: CFC rules	3
5.	BEPS Action 5: Harmful tax practices	3
6.	BEPS Action 11: Measuring and monitoring BEPS	3
7.	BEPS Action 12: Mandatory disclosure rules	3
8.	BEPS Action 15: Multilateral convention to implement tax treaty-related measures to prevent BEPS	3

V Miscellaneous topics

A	Indirect taxes and international taxation	
1.	The origin and destination bases for indirect taxes	2
2.	GATT and GATS rules and the limitation on border tax adjustment	2
3.	WTO rules and taxes – the WTO dispute resolution regime and taxation	2
B	Cross-border mergers	
1.	Examination of some of the issues and solutions	2
C	OECD Secretariat analysis of tax treaties and the impact of the COVID-19 crisis	3

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

OECD. *Base Erosion and Profit Shifting Project: 2015 Final Reports. Executive Summaries* (Paris: OECD, 2015)
Available from the OECD:
www.oecd.org/ctp/beps-reports-2015-executive-summaries.pdf

OECD, Committee on Fiscal Affairs. *Model Tax Convention on Income and on Capital* (Paris: OECD, 2017) [ISBN: 9789264287945]
Available from the OECD:
www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *Transfer Pricing Guidance on Financial Transactions: Inclusive Framework on BEPS. Actions 4, 8-10* (Paris: OECD, 2020)
Available from the OECD: www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations* (Paris: OECD, 2022) [ISBN: 9789264526914]
Available from the OECD:
www.oecd-ilibrary.org

United Nations. *UN Model Double Taxation Convention between Developed and Developing Countries 2021*. (New York: UN, 2021) [ISBN: 9789212591841]
Available from the United Nations: www.un.org

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volume A (Leiden: International Tax Centre, 2020) [ISBN: 9789082585452]
Candidates with a pre-2016 edition may instead take Volume 1 of the earlier edition into the examination.
Available from the International Tax Centre at Leiden University:
www.itc-leiden.nl or b.bosman@itc-leiden.nl
Or available from Wildy & Sons: www.wildy.com

No other texts may be taken into the examination.

Essential Reading

OECD. *Action Plan on Base Erosion and Profit Shifting* (Paris: OECD, 2013) [ISBN: 9789264202702]
Available from the OECD:
www.oecd-ilibrary.org

Candidates can obtain OECD documents from some bookshops, or directly from the OECD iLibrary at www.oecd-ilibrary.org.

United Nations. *UN Model Double Taxation Convention between Developed and Developing Countries 2021*. (New York: UN, 2021) [ISBN: 9789212591841]
Available from the United Nations: www.un.org

United Nations. *UN Practical Manual on Transfer Pricing for Developing Countries 2021* (New York: UN, 2021) [ISBN: 9789212591858]
Available from the United Nations: www.un.org

Books

Unfortunately, there is no single textbook or casebook for the entire syllabus. There are books which cover parts of the syllabus, but these need to be supplemented by references to articles in periodicals (see below).

Most of the books below are available from www.amazon.com. CCH publications are available to order from www.cchinformation.co.uk.

Books to which candidates should refer are:

Arnold, B. *International Tax Primer* (Kluwer Law International, 4th edition, 2019) [ISBN: 9789403502823]
Available from Wolters Kluwer:
<https://lrus.wolterskluwer.com/store>

Baker, P. *Double Taxation Conventions* (London: Sweet & Maxwell, loose leaf 3rd edition, 2020) [ISBN: 9780421673601]
Available from Sweet & Maxwell:
www.sweetandmaxwell.co.uk

Harris, P. *International Commercial Tax* (Cambridge University Press, 2nd edition, 2020) [ISBN: 9781108477819]
Available from Cambridge University Press:
www.cambridge.org/gb/academic

Oats, L. *Principles of International Taxation* (Bloomsbury Professional, 8th edition, 2021) [ISBN: 9781526519566]
Contents catered to ADIT syllabus.
Available from Bloomsbury Professional:
www.bloomsburyprofessional.com

Qureshi, A. *The Public International Law of Taxation* (Kluwer Law International, 2nd edition, 2019) [ISBN: 9789041184764]
Available from Wildy & Sons: www.wildy.com

Reimer, E. and Rust, A. *Klaus Vogel on Double Taxation Conventions* (Kluwer Law International, 5th edition, 2022) [ISBN: 9789403513003]
Available from Wolters Kluwer:
<https://irus.wolterskluwer.com/store>

Rohatgi, R. *Roy Rohatgi on International Taxation*. Volume 1 (IBFD, 2018) [ISBN: 9789087224943]
Available from IBFD: www.ibfd.org

Schwarz, J. *Schwarz on Tax Treaties* (Kluwer Law International, 6th edition, 2021) [ISBN: 9789403526300]
Available from Wolters Kluwer:
<https://irus.wolterskluwer.com/store>
(Discount available for registered ADIT students)

Schwarz, J. *Booth and Schwarz: Residence, Domicile and UK Taxation* (Bloomsbury Professional, 21st edition, 2022) [ISBN: 9781526522634]
Available from Bloomsbury Professional:
www.bloomsburyprofessional.com
Or available from Amazon: www.amazon.com

Shome, P. et al. *Reimagining International Taxation: Navigating Through the Crises of Pandemic, Lack of Consensus and Retrospective Taxation* (Oakbridge, 2021) [ISBN: 9788194991175]
Available from M&J Services: <https://mandjservice.com>

Periodicals

Because international taxation is a rapidly developing subject, and because of the lack of a single textbook, candidates will have to follow much of the course through articles in periodicals. Several periodicals are devoted to the subject of international taxation. Unfortunately, only a very good tax library is likely to have all these periodicals. A number of the journals are available electronically from various websites.

The principal periodicals are:
British Tax Review (London: Sweet & Maxwell) [ISSN: 00071870]
Also known as *BTR*.
Available from Sweet & Maxwell:
www.sweetandmaxwell.co.uk

Bulletin for International Taxation (Amsterdam: IBFD) [ISSN: 00074624]
Available from IBFD:
www.ibfd.org

Cahiers de Droit Fiscal International (Studies on International Fiscal Law) (Deventer: Kluwer Law International)
Also known as *Cahiers DFI*. Despite its title, most reports in the Cahiers are published in English.
Available from IFA:
www.ifa.nl/publications/cahiers/pages/default.aspx

EC Tax Review (New York: Kluwer Law International) [ISBN: 9789880007408]
Available from Kluwer Law International:
www.kluwerlawonline.com

European Taxation (Amsterdam: IBFD) [ISSN: 00143138]
Available from IBFD: www.ibfd.org

Intertax (Deventer: Kluwer Law International)
Available from Kluwer Law International:
www.kluwerlawonline.com

Tax Notes International (Tax Analysts) [ISSN: 10483306]
Available from LexisNexis: www.lexisnexis.co.uk
Also available from Tax Analysts: www.taxanalysts.com

Case Law

The syllabus does not examine the rules of any one state. Decisions of the courts of many countries are therefore relevant to this subject. Leading cases are drawn from as far afield as New Zealand, South Africa, Canada, France and Germany.

Cases from the non-English speaking world are generally from the Bundesfinanzhof (German Federal Tax Court), the Conseil d'Etat (French Supreme Administrative Court) or the Hoge Raad (Netherlands Supreme Court). The more important cases are summarised in *European Taxation* or the *Bulletin for International Taxation*.

International Tax Law Reports, also known as *ITLR*, contains the texts of important international tax cases (including English translations of some cases). Available from LexisNexis: www.lexisnexis.co.uk

These law reports are available online as part of the LexisNexis online service. CCH's *British Tax Cases* are also useful.

The IBFD also offers a useful *Tax Treaty Database*. Available at: www.ibfd.org/IBFD-Products/Tax-Treaties-Database

MODULE 2.01 - AUSTRALIA OPTION

I	Income Tax	70%
II	Fringe Benefits Tax (FBT)	10%
III	Goods and Services Tax (GST)	20%

I Income Tax

A	Jurisdiction to tax – Australian residents	
	1. Concepts of residency: distinguishing between residents, temporary residents and foreign residents	3
	2. Concepts of source: classes of oncome and statutory/common law source rules	3
B	Concepts of income	
	1. Ordinary income	2
	2. Statutory income	2
C	Deductions	
	1. General deductions formula	2
	2. Special deductions	2
	3. Statutory allowances	2
D	Taxing capital gains	
	1. CGT events	2
	2. CGT assets	2
	3. CGT exemptions	2
	4. CGT concessions and rollovers	2
E	Taxing residents on foreign income	
	1. Exemption/exemption with progression methods	3
	2. Foreign tax credit (known as “foreign income tax offset”) methods	3
	3. Deduction methods	1
	4. Attribution of income CFC; transferor trust; FIFs	2
F	Taxing foreign residents	
	1. Withholding taxes on certain dividends	3
	2. Withholding taxes on interest	3
	3. Withholding taxes on royalties	3
	4. Taxes on capital gains	3
	5. Other income	3
G	Taxing temporary residents	
	1. Australian sourced income	2
H	Domestic anti-avoidance measures	
	1. General anti-avoidance rule (GAAR)	3
	2. Multinational anti-avoidance law (MAAL)	2
	3. Diverted profits tax (DPT)	2
	4. Thin capitalisation	2
	5. Tax scheme promoters (Taxation Administration Act 1953)	3
I	Double tax agreements (DTAs)	
	1. Taxes covered	3
	2. Taxpayers covered	3
	3. Time-frame covered	3
	4. Allocation rules	3
	5. DTA methods to avoid double taxation	3

II Fringe Benefits Tax (FBT)

A	General principles	3
B	Exemptions	2
C	Valuation of fringe benefits	
1.	Cars	1
2.	Loans and debt waiver	1
3.	Expense payment	1
4.	Housing	1
5.	Property	1
6.	Residual	1
7.	Exemptions, reductions and concessions	1
D	International aspects	3

III Goods and Services Tax (GST)

A	General principles	3
B	Registration	2
C	Grouping	2
D	Non-taxable supplies	2
E	GST-free supplies	2
F	Input taxed supplies	2
G	International aspects	
1.	Exports	3
2.	Imports	3
3.	Concept of “connected with Australia”	3

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following text only into the examination:

Deutsch, R. et al. *Australian Tax Handbook 2022* (Thomson Reuters Australia, 2022)

[ISBN: 9780864697226]

Available from Thomson Reuters:

<https://legal.thomsonreuters.com.au/the-australian-tax-handbook-2021/productdetail/128887>

No other texts may be taken into the examination.

Essential Reading

Income Tax Assessment Acts

Available from ComLaw: www.comlaw.gov.au

Additional Reading

Deutsch, R. et al. *Principles and Practice of Double Taxation Agreements* (BNA International, 2008)

[ISBN: 9780906524152]

Available from BNA International:

www.bnai.com/shop

Taylor, J. et al. *Understanding Taxation Law 2022* (LexisNexis, 2022)

[ISBN: 9780409355185]

Available from LexisNexis: www.lexisnexis.com.au

Wolters Kluwer. *Australian Master Tax Guide: Tax Year End Edition* (Wolters Kluwer, 71st edition, 2022) [ISBN: 9781922509642]

Available from Wolters Kluwer:

www.wolterskluwer.com.au

Case Law

The following court decisions:

- Associated Newspapers Ltd v Federal Commissioner of Taxation (FCT); Sun Newspapers Ltd v FCT (1938) 61 CLR 337
 - Blank v Commissioner of Taxation (CT) (2016) 258 CLR 439
 - Chevron Australia Holdings Pty Ltd v CT [2017] FCAFC 62]
 - CT v Hart (2004) 217
 - CT v McNeil (2007) 229 CLR 656
 - FCT v BHP Billiton Ltd [2020] HCA 5
 - FCT v Bogiatto & Ors (No 2) [2021] FCA 98
 - FCT v French (1957) 98 CLR 398
 - FCT v Myer Emporium (1987) 163 CLR 199
 - FCT v Payne (2001) 202 CLR 93
 - FCT v Robert Mitchum (1965) 113 CLR 401
 - FCT v Spotless Services Ltd (1996) 186 CLR 404
 - FCT v Thomas [2018] HCA 31]
 - London Australia Investment Co Ltd v FCT (1977) 138 CLR 106
 - Lunney v FCT; Hayley v FCT (1958) 100 CLR 478
 - McLaurin v FCT (1961) 104 CLR 381
 - Peter Greensill Family Co Pty Ltd (trustee) v CT [2021] FCAFC 99
 - Ronpibon Tin NL v FCT; Tongkah Compound NL v FCT (1949) 78 CLR 47
 - Uber BV v CT [2017] 1 FCA 110
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MODULE 2.02 - CHINA OPTION

I	The structure of the Chinese tax system	5%
II	Individual Income Tax (IIT)	15%
III	Enterprise Income Tax (EIT)	80%

I The structure of the Chinese tax system

A	Sources of tax law	1
B	Structure of tax administration	1

II Individual Income Tax (IIT)

A	Jurisdiction to tax	2
B	Schedular system	2
C	Wages and salaries	2
D	Business income	2
E	Services	2
F	Income from property and investment	2
G	Capital gains	2
H	The effects of tax treaties	3
I	Tax administration	1

III Enterprise Income Tax (EIT)

A	Legislative framework	1
B	Jurisdiction to tax	1
C	Inbound rules: Foreign investment enterprises	
	1. Residence	2
	2. Taxable income	2
	3. Tax rates	2
	4. Tax incentives	2
	5. Reorganisations	3
	6. Thin capitalisation rule	3
D	Inbound rules: foreign corporations operating in China	
	1. "Establishment", "place of business" and "agent"	3
	2. Effectively connected income	3
	3. Treaty considerations	3
E	Inbound withholding taxes on investment income	
	1. Chinese source of income	2
	2. Dividends	2
	3. Interest	2
	4. Rents and royalties	2
	5. Capital gains	2
	6. Treaty consideration	3
F	Outbound rules	
	1. Foreign tax credit	3
	2. Controlled Foreign Corporations (CFCs)	3
G	Transfer pricing	3
H	General anti-abuse rule (GAAR)	3

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

King & Wood Mallesons. *China Master Tax Guide 2021* (Wolters Kluwer, 2021) [ISBN: 9789887935759]
Available from Professional Bookshop:
www.pbookshop.com

Zhang, X. *The Law and Practice of International Tax Treaties in China* (Wildy, Simmonds and Hill Publishing, 2003) [ISBN: 9781898029625]
Available from Amazon: www.amazon.com

No other texts may be taken into the examination.

Essential Reading

Cao, F. *Corporate Income Tax Law and Practice in the People's Republic of China* (Oxford University Press, 2011) [ISBN: 9780195393392]
Available from Amazon: www.amazon.com

Li, J. *International Taxation in China: A Contextualized Analysis* (IBFD, 2016) [ISBN: 9789087223809]
Available from IBFD: www.ibfd.org

Li, J. "Fundamental Enterprise Income Tax Reform in China: Motivations and Major Changes" (2007)
Available from Social Science Research Network:
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1030656

Li, J. "Tax Transplants and Local Culture: A Comparative Study of the Chinese and Canadian GAAR" (2010)
Available from Social Science Research Network:
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1645336

Li, J. "The Great Fiscal Wall of China: Tax Treaties and Their Role in Defining and Defending China's Tax Base" (2012)
Available from Social Science Research Network:
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2159405

Li, J. and Huang, H. "Transformation of the Enterprise Income Tax in China: Internationalization and Chinese Innovations" (2008)
Available from Social Science Research Network:
http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1313727

State Administration of Taxation. *SAT Bulletin (Gonggao) [2016] No. 64: Bulletin on Issues Related to Improving the Administration of Advance Pricing Agreements* (SAT, 2016)
Available from State Administration of Taxation:
www.chinatax.gov.cn/2013/n2925

State Administration of Taxation. *Circular (Guoshuifa) of the State Administration of Taxation on the Issue of the Implementation Measures of Special Tax Adjustments (Provisional)* (SAT, 2009, No. 2)
Available from KPMG:
www.kpmg.com/CN/en/services/Tax/Global-Transfer-Pricing-Services/Documents/Circular-20090108-0002-1e.pdf

United Nations. *UN Practical Manual on Transfer Pricing for Developing Countries (2021)* (New York: UN, 2021)
Available from the United Nations: www.un.org

2011 UK/China Double Taxation Convention, together with 2013 Protocol

MODULE 2.03 - CYPRUS OPTION

I	Income Tax	
A	Basic concepts	5%
B	Sources of income	10%
C	Deductions, exemptions and personal allowances	10%
D	Special modes of taxation	5%
E	Reorganisations	5%
F	Base Erosion and Profit Shifting (BEPS) and relevant EU initiatives	15%
G	Double taxation relief and the Cyprus double tax treaty network	15%
II	Special Defence Contribution (SDC)	5%
III	Capital Gains Tax	8%
IV	General Healthcare System	
V	Collection and assessment of tax	
VI	Trusts	10%
VII	Land Transfer Fees	
VIII	Stamp Duty	
IX	Value Added Tax (VAT)	10%
X	Organisation of the Tax Department	2%

I **Income tax**

A	Basic concepts	
	1. Meaning of residence for individuals and relevance of the term	3
	2. Meaning of residence for legal entities and relevance of the term	3
	3. Explanation of transparency of partnerships	1
	4. Meaning of tax year	2
	5. Explanation of the implications of statute law, case law and tax circulars	1
	6. Meaning of arm's length transactions and implications of Article 33	2
B	Sources of income	
	1. Explanation of income of residents vs. non-residents	2
	2. Income from business including from isolated transactions (badges of trade)	3
	3. Income from employment including benefits in kind and 90-day rule	2
	4. Income from dividends	2
	5. Income from interest, including explanation of interest income treated as business income	2
	6. Income from pensions and annuities	2
	7. Income from immovable property, including value of owner's benefit	2
	8. Income from intellectual property	3
	9. Income from trading goodwill	2
	10. Income from benefit on debit balances	3
C	Deductions, exemptions and personal allowances	
	1. The concept of chargeable income	3

2.	Deductible and non-deductible expenditure	3
3.	Exemptions available including overseas permanent establishments	2
4.	Deemed interest expense on 'fresh capital' injection from 1 January 2015	3
5.	Tax treatment of losses	3
6.	Capital allowances	3
7.	Personal allowances	3
8.	Social insurance and social cohesion fund contributions	2
D	Special modes of taxation	
1.	Shipping and aircraft businesses	1
2.	Insurance companies	1
3.	Royalties	2
4.	Film rentals	2
5.	Income of professionals, artists and other public entertainers	2
6.	Income of companies providing services to the upstream energy sector	2
E	Debt restructuring	
1.	Definition of restructuring, lender, restructuring price	2
2.	Exemption from taxation of amounts written off restructured loans	2
3.	Provisions to which exemptions do not apply	2
F	Reorganisations	
1.	Types of reorganisations	1
2.	Tax implications of reorganisation schemes	1
3.	Exemptions do not apply in cases of artificial arrangements for the purposes of avoidance or deferral of taxes	2
G	Base Erosion and Profit Shifting (BEPS) and relevant EU initiatives	
1.	Understanding of the concept of BEPS, and BEPS as a tax avoidance issue	1
2.	BEPS by trading, royalty and financing companies	2
3.	Provisions in Cyprus legislation to combat BEPS	3
4.	Double taxation avoidance where related companies are caught in BEPS, the European code of conduct (EC2006/C176/02) and the relevant provisions of Article 9, OECD MTC	1
5.	DAC6 reporting of cross-border transactions	2
H	Anti Tax Avoidance Directive (ATAD)	
1.	Interest limitation rule	2
2.	Controlled foreign company (CFC) rule	2
3.	General anti-abuse rule (GAAR)	2
4.	Exit taxation	2
5.	Hybrid mismatch rules	2
I	Double taxation relief and the Cyprus double tax treaty network	
1.	Double tax treaty relief	3
2.	Unilateral relief and relief for underlying tax	3
3.	Outline of the OECD MTC	3
4.	Cyprus's double taxation treaty network, including knowledge of the most popular treaties for inward and outward investment	3
5.	Restriction of Foreign Dividend income exemption if it erodes the taxable base of the remitter company	2
6.	Restriction of unilateral double taxation relief on foreign dividends received in cases of artificial arrangements for the purposes of avoidance or deferral of taxes	2
7.	Multilateral automatic exchange of information – application of the OECD Common Reporting Standard (CRS)	1

II Special Defence Contribution (SDC)

A	Application of SDC	
1.	Residents and domiciled vs. non-domiciled residents and non-residents (including when the beneficial owner of a structure is non-domiciled or non-resident)	1
B	Taxation of dividends	
1.	SDC on dividends and deemed dividend distribution rules	1
2.	Exemption of SDC on dividends between resident companies and the four year exception rule	1
3.	Clawback of deemed distribution exemption on reorganisation, on the future disposal of previously exempt asset transfer	2
4.	Definition of restructuring, lender, restructuring price	1
5.	Exemption from deemed distribution of amounts written off restructured loans	2
6.	Provisions whereby exemption from deemed distribution of amounts written off from restructured loans does not apply, and general anti-avoidance provisions	2
C	Taxation of interests	
1.	SDC on interest including explanation of application when interest is considered business income	1
2.	Application of the reduced rate	1
D	Taxation of rental income	
1.	SDC on rental income	1

III Capital Gains Tax

A	Chargeable gain	1
B	Rollover relief	1
C	Application to sale of shares	1
D	Exemptions and losses	1
E	Exemption from scope of tax of disposals of taxable property acquired up to 31 December 2016	1
F	Definitions of restructuring, lender, restructuring price	2
G	Capital Gains Tax exemption for amounts written off from restructured loans	2
H	Provisions under which exemptions do not apply	2
I	Tax is the obligation of the borrower, but the lender has the obligation to withhold in cases where exemptions do not apply	2
J	Definitions of sale and leaseback, finance lease, simple finance lease, lessor, leasehold premium, lessee, connected person and company	2
K	Transfer of leasehold premiums between connected parties; tax obligation on the lessee, the lessor has the obligation to withhold the tax	2

IV General Healthcare System

A	Contribution base	2
B	Contribution rates per type of income	2
C	Administration	2

V Collection and assessment of tax

A	Method and dates of payment of tax, including temporary taxation provisions	2
B	Penalties for late or non-payment	2
C	Powers of the Commissioner	1
D	Definitions for debt restructuring, lender, restructuring price	1

E	Memo on immovable property transferred to the lender when the property is transferred under a debt restructuring scheme	1
F	Commissioner discretion to transfer the memo to another property, to negotiate a settlement to free it from the memo or to grant relief for insolvent individuals of illiquid companies	1
G	Objections, assessments and appeals	1
VI	Trusts	
A	The Cyprus International Trust vs. the Cyprus Trust	3
B	Administration of a trust for tax purposes	3
VII	Land Transfer Fees	
A	Rates of fees	1
B	Definitions for restructuring, lender, restructuring price	1
C	Anti-avoidance; false declaration of the restructuring price	1
VIII	Stamp Duty	
A	Basic rules regarding instruments liable to duty	1
B	Definitions for restructuring, lender, restructuring price	1
C	Stamp duty exemption for documents within a debt restructuring scheme	1
D	General anti-avoidance provision regarding artificial arrangements for tax avoidance	1
IX	Value Added Tax (VAT)	
A	Meaning of taxable person and taxable supply	2
B	Place of supply rules for goods and services, including triangulation and reverse charge principle	2
C	The application of VAT to cross-border acquisitions and supplies	2
D	The application of VAT to imports and exports	2
E	VAT mixed transactions	2
F	Optional cash accounting scheme	2
G	Application of harmonised time limits for issuing invoices for intra-Community trade	2
H	Electronic invoices: content, storage, transmission, integrity and authenticity	2
I	Tax point changes for lawyers' services and services in the building industry	2
J	Definitions for debt restructuring, lender, restructuring price	1
K	Memo on immovable property transferred to the lender when the property is transferred under a debt restructuring scheme	1
L	Commissioner discretion to transfer the memo to another property, to negotiate a settlement to free it from the memo or to grant relief for insolvent individuals of illiquid companies	1
X	Organisation of the Tax Department	
A	Organisation of the Tax Department	3

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

OECD, Committee on Fiscal Affairs. *Model Tax Convention on Income and on Capital* (Paris: OECD, 2017) [ISBN: 9789264287945]
Available from the OECD online bookshop:
www.oecdbookshop.org

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volume A (Leiden: International Tax Centre, 2020) [ISBN: 9789082585452]
Candidates with a pre-2016 edition may instead take Volume 1 of the earlier edition into the examination.
Available from the International Tax Centre at Leiden University:
www.itc-leiden.nl or b.bosman@itc-leiden.nl
Or available from Wildy & Sons: www.wildy.com

No other texts may be taken into the examination.

Publications

CTR. *A Practical Application of Income Tax in Businesses* (CTR Publications)
This manual covers all tax legislation in Cyprus in detail, giving an article-by-article explanation of the law, and including important court decisions and tax circulars. Loose leaf binder with subscription required for updates. Available only in Greek.
Available from CTR Publications:
www.ctrpublications.com

CTR. *A Practical Application of VAT in Businesses* (CTR Publications)
This manual covers all VAT legislation in Cyprus in detail, giving an article-by-article explanation of the law, and including important court decisions and tax circulars. Loose leaf binder with subscription required for updates. Available only in Greek.
Available from CTR Publications:
www.ctrpublications.com

OECD, Committee on Fiscal Affairs. *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations* (Paris: OECD, 2022) [ISBN: 9789264526914]
Available from the OECD:
www.oecd-ilibrary.org

Savvides, S. *Cyprus Tax Laws loose-leaf books in Greek* (CTR Publications) [ISBN: 99635950104]
Available from CTR Publications:
www.ctrpublications.com

Terra, B. and Kajus, J. *A Guide to the European VAT Directives 2022*. Volume 1 (IBFD, 2022) [ISBN: 9789087227562]
Available from IBFD: www.ibfd.org

Case Law

Particular attention should be given to the following court decisions:

- Canada: *Prévost Car Inc vs. The Queen*, 2008 D.T.C. 3080, on the definition of the term ‘beneficial ownership’ in the context of a double tax treaty
- CY: *Hagop Matossian*, Case 1102 [14.9.1992], on tax of notional profit, enforcing the principle laid down in the UK case of *Sharkey vs. Wernher* [1956]
- CY: *Faunus Investment Company Ltd*, Case 423/85 [30.12.1986], on rule that double tax treaty provisions override local tax law provision
- CY: *Serafino Shoe Industry and Trading Limited*, Case 757 [16.05.1991], on rules on interpreting provisions of tax law
- CY: *Canon Assurance Limited*, Case 1203, [26.01.1996], on existence of permanent establishment
- ECJ: *Marks and Spencer plc vs. David Halsey (Her Majesty’s Inspector of Taxes)*, Case C-446/03 [13.12.2005], on use of losses from foreign subsidiary as group relief
- UK: *Wood vs. Holden* [26.01.2006], on place of management and control

The following court decisions are also of interest:

- CY: Amani Enterprises (Houses) Ltd, Case 438 [27.3.1990], on badges of trade
- CY: Lavar Shipping Co. Ltd, Case 1109 [15.7.1994], on general principle regarding deduction of losses
- CY: Ktimatiki Etaireia A X''Savva Ltd [Κτηματική Εταιρεία Α. Χ''Σάββα Λτδ], Case 2090, [18.12.1997], on badges of trade
- CY: Theodosia Karaolis Holdings Ltd and A Kapetanios Holdings Ltd, Case 138/05 [11.02.2009], on computation of taxable gain for capital gains tax purposes when selling shares in a company that owns immovable property in Cyprus

International court cases can be found through a simple internet search.

Cyprus court cases are available free of charge from the Cyprus Bar Association's website:

www.cylaw.com

Tax Laws and Treaties

Particular attention should be given to the following:

- *The Income Tax Law, Law 118(I)/2002*
- *The Special Defense Contribution, Law 117(I)/2002*
- *The Capital Gains Tax, Law 52/1980*
- *The General Healthcare System, Law 89(I)/2001*

All are available from the Ministry of Finance website:

www.mof.gov.cy

Other Tax and VAT Laws and Circulars

Particular attention should be given to the following circulars issued by the Department of Inland Revenue of Cyprus:

On exchange differences:

- Circular 1990/23 – Tax treatment of exchange differences
- Circular 2008/4 – Tax treatment of exchange differences arising directly or indirectly from the sale and purchase of shares

On the income/profit tax exemption on sale of titles:

- Circular 2008/13 – List of investment products that constitute 'titles'
- Circular 2009/6 – Amendment to circular 2008/13

On the deductibility of interest expense:

- Circular 2010/8 – Interest that is not deductible for the purposes of calculating taxable income (Article 11 of the Income Tax Law)

On deduction of losses and distribution of expenses at arriving at taxable income:

- Circular 2008/14 – Deduction of losses and distribution of expenses and deductions for the purposes of determining taxable income

On when interest income constitutes business income:

- Circular 2003/8 – Article 8(19) of the Income Tax Law and Article 3(2)(b)(i) of the special contribution for the defence of the Republic Law

On debt restructuring:

- Circular 2016/2 – Debt restructuring

On BEPS:

- Double taxation relief for related companies, Law 11(III)/2006 (90/436/EEC)
- Circular 2007/5 – Acknowledgement of Law 11(III)/2006 and application of EU code 2006/C176/02
- Letter of Director of Taxes dated 4 July 2011 to ICPAC on acceptable profit margins (within the frame of s.33 of Law 118(I)/2002 on triangular loan relationships between connected companies)
- ACTL Ministerial Order 161/2016 dated 20 May 2016 on Multilateral Automatic Exchange of Information (Adoption of the OECD Common Reporting Standard)

On double tax relief:

- Circular 2011/14 – Providing tax relief with regards to overseas tax that was paid on income arising outside of the Republic and which is taxable in the Republic (Articles 35 and 36 of the Income Tax Law)

On double tax treaties:

- Circular 2012/11 – Protocol that amends the Double Tax Treaty between Cyprus and Russia

On benefits in kind:

- EE37 Income Tax, 15 April 2019

On non-returnable capital contributions:

- EE25 Income Tax, 3 September 2018

On back-to-back financing arrangements:

- EE03 Income Tax, 30 June 2017

On the Notional Interest Deduction (NID):

- Circular 2016/10 – Interpretation and Tax Practice for New Article 9B of the Income Tax Law 116 (I) / 2015 for Notional Interest Deduction (NID) on new capital injected into the enterprise

On non-domiciles:

- Circular 2017/03 – Exemption from special contribution to the defense of the Republic for non-residents in Cyprus

Tax circulars are available only in Greek, and are available from the Ministry of Finance website: www.mof.gov.cy/mof/ird/ird.nsf/dmlcirculars_gr/dmlcirculars_gr?OpenDocument

Particular attention should be given to the following VAT circulars, issued by the authorities:

- Interpretative Circular 86 – Place of supply of services – changes after 1 May 2004
- Interpretative Circular 139 – Change in the place of supply rules for services as of 1 January 2010
- Interpretative Circular 145 – Change in the place of supply rules for certain services as of 1 January 2011

The following VAT circulars are also of interest:

- Interpretative Circular 101 – Sale of buildings with the land

- Interpretative Circular 105 – Barter transactions in the construction industry
- Interpretative Circular 127 – Deduction of input VAT when applying the reverse charge
- Interpretative Circular 166 – Obligation to register under Article 11B

VAT circulars exist only in Greek and are available from the Ministry of Finance website:

www.mof.gov.cy/mof/vat/vat.nsf/All/EB4F13A5B6603053C225723C002A8DDF?OpenDocument

European Union Directives

The following EU Directives are of interest:

- Council Directive 2003/49/EC of 3 June 2003 on a common system of taxation applicable to interest and royalty payments made between associated companies of different Member States [Interest and Royalties Payments Directive]
- Council Directive 2003/123/EC of 22 December 2003 on the common system of taxation applicable in the case of parent companies and subsidiaries of different Member States [Parents – Subsidiary Directive]
- Council Directive 2005/19/EC of 17 February 2005 on the common system of taxation applicable to mergers, divisions, transfers of assets and exchanges of shares concerning companies of different Member States [Mergers Directive]
- Council Directive 2016/1164 of 12 July 2016 laying rules against tax avoidance practices directly affecting the internal market, and Council Directive 2017/952 of 29 May 2017 on hybrid mismatches with third countries amending the 2016/1164 Directive
- Council Directive 2018/822 of 25 June 2018 (DAC6) on mandatory automatic exchange of information of reportable cross-border transactions (refer also to the FAQ on application of DAC6 of the Tax Department's website)

MODULE 2.04 - HONG KONG OPTION

I	Income Tax	
A	Taxation of individuals	25%
B	Taxation of corporate business	35%
C	Tax administration	10%
D	Tax planning and tax audit	10%
E	Transfer Pricing, Double Taxation relief and Hong Kong Double Taxation Treaty Network	10%
II	Stamp Duty	10%

I Income Tax

A	Taxation of individuals	
1.	Salaries tax on income from employment	3
2.	Profits tax on income from self-employment	2
3.	Property tax on income from property	1
4.	Personal assessment	1
	Within each of the above headings:	
i.	Scope of charge: meaning of source of income and residence issues	3
ii.	Deduction, relief, and allowances	2
iii.	Calculation of tax liability	1
B	Taxation of corporate business	
1.	Profits tax on income of Hong Kong companies trading in Hong Kong, mainland China and overseas	3
2.	Profits tax on income of non-Hong Kong resident companies trading in Hong Kong	2
3.	Special categories of taxpayer	
i.	Insurance corporations	2
ii.	Financial institutions	2
iii.	Shipping and airline companies (including ship leasing and aircraft leasing companies)	2
iv.	Clubs and associations	2
v.	Funds	2
	Within each of the above headings:	
i.	Scope of charge: meaning of source of income and residence issues	3
ii.	Deduction, relief, allowances	2
iii.	Calculation of tax liability	1
C	Tax administration	
1.	Assessment procedures and tax compliance	1
2.	Objections and appeals	2
3.	Penalties	2
D	Tax planning, and tax audit	
1.	Tax deferral and mitigation – principles and strategies	3
2.	Anti-tax avoidance rules – specific rules, general rules and transfer pricing rules	3
3.	Advance ruling	1
4.	Tax investigation – process, methods of quantification of under-statement, offences and penalties	2
E	Transfer pricing, double taxation relief and the Hong Kong double tax treaty network	
1.	The basis of double taxation relief: unilateral and bilateral	2
2.	The rules for determining double taxation relief: tax deduction, tax exemption, tax credit, etc.	1
3.	The Hong Kong treaty network, and operation of major tax treaties and arrangements (the relevant treaties and arrangements will be provided in the examination paper)	1
4.	Principle and operation of transfer pricing	2
5.	Transfer pricing methodologies and documentation, including advance pricing agreements (APAs)	1

II Stamp Duty

A	Scope of charge	2
B	Voluntary disposition	2
C	Relief and exemption	2
D	Calculation of Stamp Duty	1
E	Stamp Duty planning	1

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Ho, P. K. W. and Mak, K. P. *Hong Kong Taxation and Tax Planning* (Pilot Publishing, 20th edition, 2021) [ISBN: 9789888652389]

Available from Bloomsbury Books:

www.bloomsbury.com.hk

Or available from Professional Bookshop:

www.pbookshop.com

Wolters Kluwer. *Hong Kong Master Tax Guide 2022-2023* (Wolters Kluwer (HK), 2022) [ISBN: 9789887617105]

Available from Wolters Kluwer:

www.wolterskluwer.com.hk

Or available from Professional Bookshop:

www.pbookshop.com

Wong, J. and Wong, P. *Taxation in Hong Kong: a Practical Guide 2021-2022* (Wolters Kluwer (HK), 2021) [ISBN: 9789887935612]

Available from Professional Bookshop:

www.pbookshop.com

No other texts may be taken into the examination.

Additional Reading

Chang, J. et al. *Butterworths Hong Kong Stamp Duty Handbook* (London: LexisNexis, 2nd edition, 2020) [ISBN: 9789888683192]

Available from LexisNexis: www.lexisnexis.com.hk

Chow, W. W. S. and Mariani, S. *Hong Kong Tax Law: Cases and Materials* (LexisNexis, 7th edition, 2021) [ISBN: 9789888764259]

Available from LexisNexis: www.lexisnexis.com.hk

Halkyard, A. and Willoughby, P. *Encyclopaedia of Hong Kong Taxation* (LexisNexis, three-volume looseleaf edition, 2011) [ISBN: 9780409996340]

Available from LexisNexis: www.lexisnexis.com.hk

Wolters Kluwer. *Hong Kong Revenue Legislation* (Wolters Kluwer (HK), 1989-)

Available from Wolters Kluwer:

www.wolterskluwer.com.hk

Online Resources

Bilingual Laws Information System (for Inland Revenue Ordinance): www.legislation.gov.hk

Hong Kong Board of Review (for Board of Review's decisions): www.info.gov.hk/bor

Hong Kong Inland Revenue Department: www.info.gov.hk/ird

MODULE 2.05 - INDIA OPTION

I	Tax jurisdiction (including territoriality)	10%
II	Taxation of individuals	15%
III	Taxation of companies	20%
IV	Tax planning	20%
V	Use of tax treaties	10%
VI	Tax procedures	10%
VII	Withholding taxes	10%
VIII	Tax administration	5%

I Tax jurisdiction (including territoriality)

A	Charge to tax, including deemed income under Section 9	3
B	Residence, ordinary residence and non-residence	3

II Taxation of individuals

A	Employment income	3
B	Reliefs	1
C	Investment income	2
D	Capital gains	3

III Taxation of companies

A	Business profits	3
B	Capital gains	3
C	Withholding taxes	3
D	Computations	3
E	Transfer pricing	2
F	Funding costs	3
G	Dividends and income from other sources	3
H	Equalisation Levy	3

IV Tax planning

A	Judicial anti-avoidance doctrine	3
B	General anti-abuse rule (GAAR)	2
C	Vodafone changes	3
D	Specific anti-avoidance legislation	1
E	Implications of the OECD BEPS Project for the Indian taxation of cross-border activities	2
F	India's positions under the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent BEPS (MLI)	2
G	Residence of partnerships	2
H	Availability of treaty benefits	2

V Use of tax treaties

A	Knowledge of most popular treaty locations for inward and outward investment	2
B	Use of treaty residence certificates	2
C	Interaction with GAAR	2
D	The courts' approach to treaties	3
E	India's Tax Information Exchange Agreement (TIEA) network	1

VI Tax procedures

A	Advance rulings	3
B	Transfer pricing	2
C	Advance pricing agreements	2
D	Section 195 procedures	3

VII Withholding taxes

A	What does withholding apply to?	2
B	Payment machinery	1
C	Withholding tax rates	2

VIII Tax administration

A	Assessment and compliance	2
B	Appellate procedure	2
C	Other judicial remedies	2
D	The Taxpayers' Charter and faceless assessment	2
E	Interest and penalties	1
F	Collection and enforcement	1

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Income Tax Act 1961 (Taxmann, 67th edition, 2022) [ISBN: 9789356220492]

Available from Taxmann: www.taxmann.com/bookstore

UK/India Double Taxation Treaty

Available from the Income Tax Department:

www.incometaxindia.gov.in/Pages/international-taxation/dtaa.aspx

Taxmann. *Direct Taxes Manual* (Taxmann, three-volume edition, 52nd edition, 2022) [ISBN: 9789356220218]

Available from Taxmann: www.taxmann.com/bookstore

No other texts may be taken into the examination.

Tax Legislation

Draft Report on Retrospective Amendments Relating to Indirect Transfer (New Delhi: Ministry of Finance Expert Committee, 2012)

Available from the Ministry of Finance:
www.finmin.nic.in

Final Report on General Anti Avoidance Rules (GAAR) in Income Tax Act 1961 (New Delhi: Ministry of Finance Expert Committee, 2012)

Available from the Ministry of Finance:
www.finmin.nic.in

Reports of the Tax Administration Reform Commission (New Delhi: Tax Administration Reform Commission, 2014-2015)

Available from the Ministry of Finance:
www.finmin.nic.in

Books

Butani, M. *Transfer Pricing: the Indian Landscape* (LexisNexis, 3rd edition, 2021) [ISBN: 9788195294534]
Available from LexisNexis: www.lexisnexis.in

Chaturvedi, K. and Pithisaria, M. *Chaturvedi and Pithisaria's Income Tax Law* (LexisNexis, 7th edition, 2020) [ISBN: 9789389991376]
Available from LexisNexis: www.lexisnexis.in

Datar, A. *Kanga and Palkhivala's The Law and Practice of Income Tax* (LexisNexis, 11th edition, 2020) [ISBN: 9789389991178]
Available from LexisNexis: www.lexisnexis.in

Mittal, D. *Indian Double Taxation Agreements and Tax Laws* (Taxmann, three-volume edition with free CD, 7th edition, 2014) [ISBN: 9789350715321]
Available from Taxmann: www.taxmann.com/bookstore

Mittal, D. *Law and Practice Relating to General Anti Avoidance Rules (GAAR)* (Taxmann, 2012) [ISBN: 9789350710685]
Available from Taxmann: www.taxmann.com/bookstore

Shome, P. *Taxation Principles and Applications: a Compendium* (LexisNexis, 2014) [ISBN: 9789351431244]
Available from LexisNexis:
www.lexisnexis.in/taxation-principles-and-applications-a-compendium.htm

Taxmann. *Equalisation Levy Commodities Transaction Tax & Securities Transaction Tax with Rules: as Amended by Finance Act 2021* (Taxmann, 2021) [ISBN: 9789390831616]
Available from Taxmann: www.taxmann.com/bookstore

Taxmann. *International Taxation Digest* (Taxmann, 2019) [ISBN: 9789388750677]
Available from Taxmann: www.taxmann.com/bookstore

Taxmann. *Transfer Pricing Digest* (Taxmann, 2019) [ISBN: 9789388750660]
Available from Taxmann: www.taxmann.com/bookstore

Additional Reading

Shome, P. "Addressing tax avoidance: cross-country experience and an Indian case study" (February 2019)
Available from SSRN:
https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3337909

Online Resources

Income Tax Department of India:
www.incometaxindia.gov.in

ITAT Online (for cases): www.itatonline.org

Ministry of Finance: www.finmin.nic.in

OECD (for BEPS): www.oecd.org/ctp/beps.htm

Taxmann: www.taxmann.com

Taxsutra: www.taxsutra.com (20% discount available for registered ADIT students)

Taxsutra Transfer Pricing portal:
www.tp.taxsutra.com (20% discount available for registered ADIT students)

MODULE 2.06 - IRELAND OPTION

I	Income Tax, Universal Social Charge (USC), Corporation Tax and Capital Gains Tax (CGT)	
A	Basic jurisdictional rules	15%
B	The application of taxes on income and capital gains to cross-border situations	20%
C	Double taxation relief	20%
D	The Irish double tax treaty network	10%
E	Transfer pricing	10%
F	Anti-avoidance	
II	Capital Acquisitions Tax (CAT)	
III	Stamp Duty	5%
IV	Pay-Related Social Insurance (PRSI)	
V	Value Added Tax (VAT) and customs	15%
VI	The impact of EU law	5%

I Income Tax, Universal Social Charge (USC), Corporation Tax and Capital Gains Tax (CGT)

A	Basic jurisdictional rules	
	1. Jurisdictional rules applying to the various categories of income and to capital gains tax	3
	2. Meaning of residence and ordinary residence for individuals, corporations, and other bodies	3
	3. Determination of Irish source or situs for various categories of income and property: trading in Ireland; Irish permanent establishment	3
	4. The imposition of tax on non-resident persons: Irish tax representatives of non-resident persons; withholding at source; domicile levy	2
	5. Domicile	3
	6. Remittance basis	3
	7. Administrative and compliance requirements	1
B	The application of taxes on income and capital gains to cross-border situations	
	1. The taxation of foreign income and gains of Irish resident individuals and corporations	3
	2. The determination and taxation of Irish source income of non-resident corporations	3
	3. Entity characterisation: the characterisation of foreign entities for various purposes	3
	4. Cross-border payments of dividends, interest, and royalties out of Ireland	3
	5. Cross-border payments of dividends, interest and royalties into Ireland	3
	6. Restriction of relief for interest paid (the distribution provisions)	3
	7. Taxation of foreign exchange transactions for trading and non-trading companies and individuals	2
	8. Cross-border re-organisations	3
	9. Tax consequences of change of individual and corporate residence (outward and inward)	3
	10. Tax issues of employees: stock options, PRSI, tax equalisation arrangements, special assignee relief, foreign earnings deduction	2
	11. Irish partnerships trading abroad; non-resident partners in Irish partnerships	1
C	Double tax relief	
	1. The basis for double tax relief: unilateral and treaty relief	3
	2. The rules for determining double tax relief: the credit code and other provisions	3
	3. Practical administration of double taxation conventions (DTCs) and foreign tax credit relief	2

D	The Irish double tax treaty network	
	1. The legal basis for negotiating and implementing DTCs in Ireland	2
	2. The approach to interpreting DTCs in Ireland	3
	3. An overview of the Irish treaty network (candidates are not expected to know the details of the entire network, but are expected to know where Irish treaty practice departs regularly from the OECD Model. Some understanding of the major Irish treaties, with the US, UK and Netherlands in particular, is expected)	2
E	Transfer pricing	
	1. Transfer pricing in Irish law	3
F	Anti-avoidance	
	1. Transfers of assets abroad	2
	2. Offshore funds	2
	3. Capital Gains Tax	3
	4. Arbitrage – Section 247 and related anti-avoidance provisions	2
	5. General anti-avoidance provision (Section 811)	2
	6. The implications of the OECD BEPS Project on Irish investment, both inbound and outbound	2
G	Non-Irish trusts	
	1. The rules relating to non-Irish resident trusts, their settlors and beneficiaries	1

II Capital Acquisitions Tax (CAT)

A	Basic jurisdictional rules	
	1. Domiciled individuals, non-domiciled individuals, deemed domicile	2
	2. Situs of assets	2
B	Double taxation and unilateral relief	1

III Stamp Duty

A	Basic jurisdictional rules	1
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IV Pay-Related Social Insurance (PRSI)

A	Application of PRSI rules in cross-border situations	2
B	Ireland's network of social security agreements	1

V Value Added Tax (VAT) and customs

A	The application of VAT to cross-border acquisitions, importations and supplies	2
B	The application of VAT to non-Irish resident entities	2
C	The post-Brexit settlement from an ROI perspective	3

VI The impact of EU law

A	The implementation of the Directives relating to direct taxation: Parent-Subsidiary Directive, Mergers Directives, Interest and Royalties Directive, Savings Income Directive	2
B	The impact on Irish tax law of the jurisprudence of the CJEU	3

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Fennell, D. *Direct Tax Acts, Finance Act 2021* (Irish Tax Institute, 2022)

Available from Irish Tax Institute: www.taxinstitute.ie

Keogan, A. and Scully, E. *Law of Capital Acquisitions Tax, Stamp Duty and Local Property Tax, Finance Act 2021* (Irish Tax Institute, 2022)

Available from Irish Tax Institute: www.taxinstitute.ie

Reade, M. *Law of Value-Added Tax, Finance Act 2021* (Irish Tax Institute, 2022)

Available from Irish Tax Institute: www.taxinstitute.ie

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volumes A, C1 and C2 (Leiden: International Tax Centre, 2020)

Candidates with a pre-2016 edition may instead take Volume 1 of the earlier edition into the examination. Available from the International Tax Centre at Leiden University:

www.itc-leiden.nl or b.bosman@itc-leiden.nl

Or available from Wildy & Sons: www.wildy.com

No other texts may be taken into the examination.

Books

Bradley, J. *PRSI, Levies and the Universal Social Charge, Finance Act 2012* (Irish Tax Institute, 2012) [ISBN: 9781842602928]

Available from Irish Tax Institute via TaxFind: www.taxinstitute.ie/TaxFind/Taxfind.aspx

Brodie, S. et al. *Value Added Tax and VAT on Property, Finance Act 2016* (Irish Tax Institute, 2017)

Available from Irish Tax Institute via TaxFind: www.taxinstitute.ie/TaxFind/Taxfind.aspx

Byrne, K. et al. *Taxing Financial Transactions, Finance Act 2010* (Irish Tax Institute, 3rd edition, 2012) [ISBN: 9781842601471]

Available from Irish Tax Institute via TaxFind: www.taxinstitute.ie/TaxFind/Taxfind.aspx

Conroy, S. *Cross-border Compliance Masterclass: Ireland and UK 2016* (Irish Tax Institute, 2016)

Available from Irish Tax Institute via TaxFind: www.taxinstitute.ie/TaxFind/Taxfind.aspx

Doherty, B. *Corporate Transactions: Tax and Legal Issues, Finance Act 2014* (Irish Tax Institute, 2015)

Available from Irish Tax Institute via TaxFind: www.taxinstitute.ie/TaxFind/Taxfind.aspx

Haccius, C. *Ireland in International Tax Planning* (2nd edition, 2004) [ISBN: 9789076078748]

Available from IBFD: www.ibfd.org

Healy-Rae, R., Barry, F. and Buitelir, D. *Who's Afraid of the ECJ? Implications of the European Court of Justice Decisions on Ireland's Corporate Tax Regime* (Irish Tax Institute, 2007) [ISBN: 9781842601655]

Available from Irish Tax Institute via TaxFind: www.taxinstitute.ie/TaxFind/Taxfind.aspx

Herlihy, J., Moore, P. and O'Sullivan, H. *Corporation Tax, Finance Act 2010* (Irish Tax Institute, 2010) [ISBN: 9781842602201]

Available from Irish Tax Institute: www.taxinstitute.ie

Maguire, T. *The Taxation of Companies 2021* (Bloomsbury Professional, 2021) [ISBN: 9781526513717]

Available from Bloomsbury Professional: www.bloomsburyprofessional.com

McQuillan, P. *Irish Income Tax 2015* (Bloomsbury Professional, 2015) [ISBN: 9781780436999]

Available from Bloomsbury Professional: www.bloomsburyprofessional.com

O'Brien, C. *Double Taxation Agreements* (Irish Tax Institute, 2014) [ISBN: 9781842603628]

Available from Irish Tax Institute: www.taxinstitute.ie

Power, T., Scully, E. and Devlin, C. *The Law and Practice of Irish Stamp Duty, Finance Act 2013* (Irish Tax Institute, 2013) [ISBN: 9781842602935]
Available from Irish Tax Institute via TaxFind:
www.taxinstitute.ie/TaxFind/Taxfind.aspx

Riordan, D. *The Taxation of Capital Gains, Finance Act 2019* (Irish Tax Institute, 2020)
Available from Irish Tax Institute via TaxFind:
www.taxinstitute.ie/TaxFind/Taxfind.aspx

Schwarz, J. *Schwarz on Tax Treaties* (Kluwer Law International, 6th edition, 2021) [ISBN: 9789403526300]
Available from Wolters Kluwer:
<https://irus.wolterskluwer.com/store>
(Discount available for registered ADIT students)

Whelan, J. and Williams, A. *Taxation of Gifts and Inheritances, Finance Act 2019* (Irish Tax Institute, 2020)
Available from Irish Tax Institute via TaxFind:
www.taxinstitute.ie/TaxFind/Taxfind.aspx

Periodicals

Cahiers de Droit Fiscal International (Studies on International Fiscal Law) (Deventer: Kluwer Law International)
Also known as Cahiers DFI. Despite its title, most reports in the Cahiers are published in English.
Relevant articles include:

- “*Foreign exchange issues and international taxation*” (Volume 94b, page 345)
- “*Is there a permanent establishment?*” (Volume 95a, p.367)
- “*Tax treaties and anti-avoidance*” (Volume 95a, p.389)
- “*Cross-border business restructuring*” (Volume 96a, p.383)

Available from IFA:
www.ifa.nl/publications/cahiers/pages/default.aspx

Irish Tax Review (Irish Tax Institute)
Relevant articles include:

- Berry, M. “Key provisions for companies – Finance No 2 Act 2013” (March 2014)

- Farrell, F. and Brady, K. “EU Social Security changes: significant changes – could they affect your clients?” (September 2010)
- Farrell, F. “International mobile directors: the final frontier” (March 2015)
- Florides, J. “Offshore funds: a quick guide to Finance Act 2007 changes” (May 2007)
- Gill and Porter. “CAT and double taxation: credit where it’s due” (September 2009)
- Keogh, N. and Sexton, L. “Taxation of fund investments – where are we at?” (March 2014)
- Maguire, T. “Corporate Tax deductions for interest after Finance Act 2011” (May 2011)
- Maguire, T. “Tax treatment of foreign dividends and EU law – are we there yet?” (May 2013)
- Quirke, J. “Dual residents: Interpreting the “tie-breaker” rules in a globalised world” (September 2014)
- Raine, M. “Sections 247 and 249 TCA 1997: interest relief on loans” (January 2013)
- Vale, P. and Meredith, S. “Foreign tax revisited: recap and update on recent changes” (June 2010)
- Walsh, F. and Smyth, P. “Offshore Funds: a little done, lots more to do” (March 2009)
- Watson, D. “Foreign direct investment: the people agenda” (September 2014)

Available from Irish Tax Institute via TaxFind:
www.taxinstitute.ie/TaxFind/Taxfind.aspx

Online Resources

International Corporate Tax Reform and Taxing Innovation in Ireland (Irish Tax Institute, February 2020)
Available from Irish Tax Institute:
www.taxinstitute.ie/event/international-corporate-tax-and-taxing-innovation-in-ireland

Transfer Pricing in Ireland 2020 and Beyond (Irish Tax Institute, November 2020)
Available from Irish Tax Institute:
www.taxinstitute.ie/event/transfer-pricing-in-ireland-2020-and-beyond

MODULE 2.07 - MALTA OPTION

I	Income Tax	
A	Jurisdiction to tax	5%
B	Ascertainment of chargeable income	10%
C	Taxation of individuals	10%
D	Taxation of companies	15%
E	Taxation of partnerships	5%
F	Special cases	5%
G	Relief from international double taxation and Malta's double tax treaty network	10%
H	Tax administration	5%
I	Anti Tax Avoidance Directive (ATAD)	5%
II	Income Tax on capital gains	10%
III	Property Transfers Tax (PTT)	5%
IV	Duty on Documents and Transfers (DDT)	5%
V	Value Added Tax (VAT)	10%

I Income Tax

A	Jurisdiction to tax	
	1. General jurisdiction rules (income arising, foreign source income, the remittance basis)	3
	2. The meaning of ordinary residence for individuals	2
	3. The meaning of ordinary residence for companies	3
	4. The meaning of domicile for individuals	2
	5. The meaning of domicile for companies	3
	6. The meaning of 'residence' for companies and individuals and relevance of the term	2
B	Ascertainment of chargeable income	
	1. The concept of chargeable income	2
	2. Deductions of a non-capital allowances nature	2
	3. Capital allowances	3
	4. 'Personal' deductions (Article 14A-14H)	2
	5. Surrendering of losses	2
	6. Relevant exemptions (Including the Participation Exemption)	3
C	Taxation of individuals	
	1. The taxation of employment income	3
	2. The Fringe Benefit rules	2
	3. Article 56(17), Article 56(21), Article 56(23), Article 56(25), Article 56(26), Article 56(27)	2
	4. The part-time and overtime rules	2
	5. Computational issues	2
D	Taxation of companies	
	1. The meaning of the term 'company'	3
	2. General tax treatment of companies	3
	3. Tax accounting	3
	4. The refundable tax credit system and the full imputation system	3
	5. Deemed distributions and the investment income provisions	2
E	Taxation of partnerships	
	1. Transparent entities for the purposes of Maltese law	2

2. The taxation of partners and partnerships, including treatment as companies	2
F Special cases	
1. Shipping companies	3
2. Collective investment schemes	3
3. Non-resident entertainers	1
4. Trusts and foundations	3
5. Aviation companies	3
6. Insurance companies	2
7. Banking companies	2
8. Petroleum profits	3
9. Rental income	3
10. Notional interest deduction	3
11. Fiscal consolidation	3
G Relief from international double taxation and Malta's double tax treaty network	
1. Double taxation treaty relief	1
2. Unilateral relief and relief for underlying tax	3
3. The Flat Rate Foreign Tax Credit	3
4. Malta's double tax treaty network	3
H Tax administration	
1. Tax compliance obligations	1
2. Penalties	1
3. Objections, assessments and appeals	3
4. Taxation and human rights	3
I Anti Tax Avoidance Directive (ATAD)	
1. Domestic implementation of ATAD measures, including CFC, interest limitation and anti-hybrid rules	3

II Income Tax on capital gains

1. Chargeable gains	3
2. Relevant definitions	2
3. Transfers of immovable property	2
4. Transfers of securities (including capital gains rules)	2
5. Transfer of interests in partnerships	2
6. Value-shifting	2
7. De-grouping	2
8. Exemptions	2

III Property Transfers Tax (PTT)

1. Scope of Article 5A, Income Tax Act	2
2. Special rules	2

IV Duty on Documents and Transfers (DDT)

1. Documents subject to duty	3
2. Transfers of shares	3
3. Transfers of immovable property	2

V Value Added Tax (VAT)

1. Concept of 'Turnover Tax'	1
2. The application of VAT to cross-border acquisitions, importations and supplies	2
3. Compliance obligations	2
4. VAT grouping	2

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Attard, R. *Principles of Maltese Income Tax Law* (Malta Institute of Management, 2019) [ISBN: 9789995715625]

Available from Malta Institute of Management:
www.maltamanagement.com

Or available from Malta Online Bookshop:
<https://maltaonlinebookshop.com>

Attard, R. *Principles of Maltese VAT Law* (Malta Institute of Management, 2009) [ISBN: 9789995780210]

Available from Malta Institute of Management:
www.maltamanagement.com

Laws of Malta, Cap 123, Income Tax Act (1949, as amended 1994)

Available from Legislation Malta:
<https://legislation.mt/eli/cap/123/eng>

Laws of Malta, Cap 364, Duty on Documents and Transfers Act (1993)

Available from Legislation Malta:
<https://legislation.mt/eli/cap/364/eng>

Laws of Malta, Cap 372, Income Tax Management Act (1994)

Available from Legislation Malta:
<https://legislation.mt/eli/cap/372/eng>

Laws of Malta, Cap 406, Value Added Tax Act (1999)

Available from Legislation Malta:
<https://legislation.mt/eli/cap/406/eng>

No other texts may be taken into the examination.

Essential Reading

Attard, R. *An Introduction to Income Tax Theory* (Agenda Books, 2005) [ISBN: 9789993267270]

Available from Professional Bookshops:
www.professionalbooks.co.uk

Attard, R. *Principles of Maltese Income Tax Law* (Malta Institute of Management, 2019) [ISBN: 9789995715625]

MODULE 2.08 - SINGAPORE OPTION

I	Income Tax	
A	Jurisdiction to tax	10%
B	Taxation of individuals	10%
C	Taxation of companies and other vehicles	15%
D	Taxation implications of debt and equity	10%
E	Ascertainment of chargeable income	10%
F	Tax planning	10%
G	Tax administration	5%
H	Relief from international double taxation	15%
II	Goods and Services Tax (GST)	15%

I Income Tax

A	Jurisdiction to tax	
	1. Charge to tax: source; remittance	3
	2. Deemed and exempt income	2
	3. Tax residence and its implications	3
B	Taxation of individuals	
	1. Employment income	3
	2. Perquisites: stock options	2
	3. Deductions and personal reliefs	1
	4. Non-resident reliefs	2
C	Taxation of companies and other vehicles	
	1. Taxation of corporate profits: trade or business	3
	2. Corporate residence and tax implication	2
D	Taxation implications of debt and equity	
	1. Deductibility of interest and other costs of debt financing	3
	2. Taxation of corporate distributions	3
E	Ascertainment of chargeable income	
	1. Deductions	3
	2. Capital allowances	3
	3. Loss relief	2
F	Tax planning	
	1. Anti-avoidance	3
	2. Advance rulings	1
	3. Transfer pricing	2
G	Tax administration	
	1. Assessment and compliance	1
	2. Objections and appellate process	2
	3. Penalties for non-compliance and violations	2
H	Relief from international double taxation	
	1. Unilateral and bilateral reliefs	3
	2. Tax credits under double tax agreements	2

II Goods and Services Tax (GST)

A	The charge to tax	3
B	Scope of charge: supply; consideration; taxable person; in the course of furtherance of business	3
C	Value of supply and time of supply	2
D	International services and taxation of the digital economy	
	1. Business-to-business supplies of imported services under the reverse charge mechanism regime	2
	2. Business-to-consumer supplies made to non GST registered persons under the new overseas vendor registration (OVR) regime	2
E	Anti-avoidance	2

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Goods and Services Tax Act, Cap 117A, Rev Ed 2005 with all subsequent amendments

Available from the Singapore Attorney-General's Chambers: <https://sso.agc.gov.sg>

Income Tax Act, Cap 134, Rev Ed 2014 with all subsequent amendments

Available from the Singapore Attorney-General's Chambers: <https://sso.agc.gov.sg>

Also available in the following publication:

Wolters Kluwer. *Singapore Income Tax Act (Cap 134)* (Wolters Kluwer, 13th edition, 2020) [ISBN: 9789814838078]

Available from Wolters Kluwer:

<https://shop.wolterskluwer.com.sg>

Wolters Kluwer. *Singapore Master Tax Guide Handbook 2022-2023* (CCH Singapore, 2022) [ISBN: 9789814838443]

Available from Wolters Kluwer:

<https://shop.wolterskluwer.com.sg>

Or available from Professional Bookshop:

www.pbookshop.com

No other texts may be taken into the examination.

Textbooks for Singapore Tax

Wolters Kluwer. *Singapore Master Tax Guide Manual* (Singapore: CCH Asia Pte Ltd, two-volume looseleaf edition, 1989-) [ISBN: 9789810010867]

Volume 2 contains a compilation of articles on a range of topics and issues that candidates may find helpful.

Available from Wolters Kluwer:

<https://shop.wolterskluwer.com.sg>

How, K. S. et al. *Goods and Services Tax: Law and Practice* (Singapore: LexisNexis, 2nd edition, 2015) [ISBN: 9789814608398]

Available from Professional Bookshop:

www.pbookshop.com

LexisNexis. *Halsbury's Laws of Singapore: Revenue and Taxation (Income Tax)*. Volume 16 (Singapore: LexisNexis, 2020) [ISBN: 9789814892209]

Available from LexisNexis: www.lexisnexis.com.sg

Hin, P., Koh, D. and Yan, T. *The Law and Practice of Singapore Income Tax* (Singapore: LexisNexis, 3rd edition, 2021) [ISBN: 9789812369796]

Available from LexisNexis: www.lexisnexis.com.sg

Additional Reading

CCH. *Tax Issues: Articles and Case Notes* (Singapore: CCH Asia Pte Ltd, 2001) [ISBN: 9789810442125]

Online Resources

Singapore IRAS: www.iras.gov.sg

Singapore Law Watch: www.singaporelawwatch.sg

Singapore Ministry of Finance/Taxation:

www.mof.gov.sg

Singapore statutes and judicial authorities:

www.lawnet.com.sg and <https://sso.agc.gov.sg>

MODULE 2.09 - UNITED KINGDOM OPTION

I	Income Tax, Corporation Tax and Capital Gains Tax	
A	Basic jurisdictional rules	10%
B	The application of corporation tax to cross-border situations	25%
C	The UK double tax treaty network (including double tax relief)	15%
D	Transfer pricing (to include thin capitalisation)	15%
E	Anti-avoidance	20%
II	Inheritance Tax	
III	Stamp Taxes	
IV	National Insurance Contributions (NICs)	15%
V	Value Added Tax (VAT) and customs duties	
VI	The impact of EU law	

I Income Tax, Corporation Tax and Capital Gains Tax

A	Basic jurisdictional rules	
	1. Jurisdictional rules applying to the various categories of income and to Capital Gains Tax	3
	2. Meaning of residence for individuals, corporations and other bodies	3
	3. Determination of UK source or situs for various categories of income and property: trading in the UK; UK permanent establishment	3
	4. The imposition of tax on non-resident persons: UK tax representatives of non-resident persons; withholding at source	3
	5. Domicile	3
	6. Remittance basis	3
	7. Administrative and compliance requirements	1
B	The application of Corporation Tax, etc. to cross-border situations	
	1. The taxation of the foreign income of UK-resident corporations	3
	2. The determination and taxation of the UK-source income of non-resident corporations	3
	3. Entity characterisation: the characterisation of foreign entities for various purposes	3
	4. Cross-border payments of dividends, interest and royalties out of the UK	3
	5. Cross-border payments of dividends, interest and royalties into the UK	3
	6. Restrictions on the deductibility of interest	3
	7. Forex rules	2
	8. Cross-border reorganisations	3
	9. Tax consequences of change of corporate residence	3
	10. Tax issues of employees: stock options, NICs, tax equalisation arrangements	2
	11. UK partnerships trading abroad; non-resident partners in UK partnerships	2
C	The UK double tax treaty network (including double tax relief)	
	1. The legal basis for negotiating and implementing double taxation conventions (DTCs) in the UK	2
	2. The approach to interpreting DTCs in the UK	3
	3. An overview of the UK treaty network (candidates are not expected to know the details of the entire network, but are expected to know where UK treaty practice departs regularly from the OECD Model. Some understanding of the major UK treaties, with the US, Netherlands, France and Germany in particular, is expected)	2
	4. Double tax relief	
	i. The basis for double tax relief: unilateral and treaty relief	2
	ii. The rules for determining double tax relief: the credit code	3
	iii. Practical administration of DTCs and foreign tax credit relief	2

D	Transfer pricing (to include thin capitalisation)	
	1. The legal basis for transfer pricing adjustments in the UK	3
	2. The UK approach to transfer pricing	3
	3. Other transfer pricing provisions	2
	4. Thin capitalisation provisions	3
	5. The UK approach to thin capitalisation	3
E	Anti-avoidance	
	1. Transfers of assets abroad	2
	2. Controlled Foreign Companies (CFCs)	3
	3. Offshore funds	1
	4. International movement of capital – reporting requirements	3
	5. Treaty abuse	2
	6. Capital Gains Tax	3
	7. Hybrid mismatch rules	3
	8. Corporate Interest Restriction (CIR)	3
	9. Diverted Profits Tax (DPT)	3
	10. Unallowable purpose rule	3
	11. General Anti-Abuse Rule (GAAR)	2
	12. Profit fragmentation rules	2
	13. Offshore receipts in respect of intangible property (ORIP) rules	2
	14. Digital Services Tax (DST)	3

II Inheritance Tax

A	Basic jurisdictional rules	
	1. Domiciled individuals, non-domiciled individuals, deemed domicile	2
	2. Situs of assets	2
B	Double taxation	
	1. The UK's network of estate taxation conventions	1
	2. Measures for relieving double taxation	1

III Stamp Duty, Stamp Duty Reserve Tax, Stamp Duty Land Tax

A	Basic jurisdictional rules	2
B	Extension of stamp duty reliefs to cross-border situations	2

IV National Insurance Contributions (NICs)

A	Application of NIC rules in cross-border situations	2
B	The UK's network of social security agreements	1

V Value Added Tax (VAT) and customs duties

A	The application of VAT to cross-border acquisitions, importations and supplies	2
B	The application of VAT to non-UK resident entities	2
C	The liability to and collection of customs duties in the UK and available reliefs	1
D	The post-Brexit settlement, including the new UK VAT rules	3

VI The impact of EU law

	1. DAC6 and the EU Mandatory Disclosure Regime	1
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RECOMMENDED READING LIST

For exams taking place in 2023, the 2022 Finance Act is considered examinable. Any subsequent Finance Act is not considered examinable.

Nonetheless, all ADIT exam candidates are expected to maintain a general understanding of recent, significant legislative changes relevant to each exam subject.

What is essential is a thorough understanding of the relevant parts of the UK tax legislation and cases, to which candidates will need direct access.

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Cordara, R. *Tolley's Orange Tax Handbook 2022-2023* (LexisNexis, 2022) [ISBN: 9781474320733]
Available from LexisNexis: www.lexisnexis.co.uk
(Discount available for registered ADIT students at www.tolley.co.uk/purchase?id=2&pc=ADIT_ET&step=2)

OECD, Committee on Fiscal Affairs. *Model Tax Convention on Income and on Capital* (Paris: OECD, 2017) [ISBN: 9789264287945]
Available from the OECD:
www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations* (Paris: OECD, 2022) [ISBN: 9789264526914]
Available from the OECD:
www.oecd-ilibrary.org

Redston, A. *Tolley's Yellow Tax Handbook 2022-2023* (LexisNexis, 2022) [ISBN: 9781474320764]
Available from LexisNexis: www.lexisnexis.co.uk
(Discount available for registered ADIT students at www.tolley.co.uk/purchase?id=2&pc=ADIT_ET&step=2)

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volume A (Leiden: International Tax Centre, 2020) [ISBN: 9789082585452]

Candidates with a pre-2016 edition may instead take Volume 1 of the earlier edition into the examination. Available from the International Tax Centre at Leiden University:

www.itc-leiden.nl or b.bosman@itc-leiden.nl

Or available from Wildy & Sons: www.wildy.com

No other texts may be taken into the examination.

Tax Legislation

CCH. *British International Tax Agreements* (CCH, updated weekly)

Online version available from CCH: www.cch.co.uk

Croner-i Green VAT Legislation

Available from Croner-i:

<https://library.croneri.co.uk/green>

Croner-i Red Tax Legislation

Available from Croner-i:

<https://library.croneri.co.uk/red>

The Stationary Office Ltd. *Finance Act 2021* (TSO, 2021)

Available from legislation.gov.uk:

www.legislation.gov.uk/ukpga/2021/26/enacted

Books

Baker, P. *Double Taxation Conventions* (London: Sweet & Maxwell, loose leaf 3rd edition, 2020) [ISBN: 9780421673601]

Available from Sweet & Maxwell:

www.sweetandmaxwell.co.uk

Dixon, J. and Finney, M. *Tolley's International Corporate Tax Planning* (LexisNexis, 5th edition, 2002)

[ISBN: 9780754513391]

Available from Amazon: www.amazon.co.uk

Kessler, J. *Taxation of Non-Residents and Foreign Domiciliaries 2021-2022* (Key Haven Publications, 20th edition, 2021) [ISBN: 9781901614862]

Available from Wildy & Sons: www.wildy.com

Fairpo, A. and Salter, D. *Revenue Law: Principles and Practice* (Bloomsbury Professional, 38th edition, 2020)
Available from Bloomsbury Professional:
www.bloomsburyprofessional.com
Or available from Blackwell's: www.blackwells.co.uk

Oats, L. *Principles of International Taxation* (Bloomsbury Professional, 8th edition, 2021) [ISBN: 9781526519559]
Contents catered to ADIT syllabus.
Available from Bloomsbury Professional:
www.bloomsburyprofessional.com

Saunders, R. *International Tax Systems and Planning Techniques 2011-2012* (London: Sweet & Maxwell, 2011) [ISBN: 9780414022683]
Available from Sweet & Maxwell:
www.sweetandmaxwell.co.uk
Or available from Wildy & Sons: www.wildy.com

Schwarz, J. *Booth and Schwarz: Residence, Domicile and UK Taxation* (Bloomsbury Professional, 21st edition, 2022) [ISBN: 9781526522634]
Available from Bloomsbury Professional:
www.bloomsburyprofessional.com
Or available from Amazon: www.amazon.com

Schwarz, J. *Schwarz on Tax Treaties* (Kluwer Law International, 6th edition, 2021) [ISBN: 9789403526300]
Available from Wolters Kluwer:
<https://irus.wolterskluwer.com/store>
(Discount available for registered ADIT students)

MODULE 2.10 - UNITED STATES OPTION

I	Federal Income Tax	
A	Basic rules and concepts	20%
B	Cross-border situations: outbound	17.5%
C	Cross-border situations: inbound	17.5%
D	US tax treaties	10%
E	Transfer pricing	10%
F	Cross-border mergers and acquisitions	5%
G	Foreign trusts	5%
H	Information reporting and information exchange	5%
II	Federal Estate Tax	
A	Basic rules and concepts	
B	Cross-border issues	10%
III	Federal Gift Tax	
A	Basic rules and concepts	
B	Cross-border tax issues	

I Federal Income Tax

A	Basic rules and concepts	
	1. US taxpayers: individuals, corporations and others	3
	2. Entity classification	3
	3. Residency tests for individuals	3
	4. Source of income and deductions	3
	5. Withholding tax principles	3
	6. Bilateral tax treaties	3
	7. Corporate groups and consolidated returns	2
	8. General anti-avoidance: substance over form	3
B	Cross-border situations: outbound	
	1. Participation exemption, Global Intangible Low-taxed Income (GILTI) and Foreign-Derived Intangible Income (FDII)	3
	2. Foreign tax credit	3
	2. Corporate transfers to foreign subsidiaries	3
	3. Distributions from foreign subsidiaries	3
	4. Foreign currency rules	2
	5. Controlled foreign corporations	3
	6. Passive foreign investment companies	3
	7. Investment in foreign partnerships, funds	2
	8. Foreign branches	3
C	Cross-border situations: inbound	
	1. US trade or business of a foreign person	3
	2. Effectively connected income	3
	3. Branch profits tax	3

4. Related party financing of US subsidiary:	
i. debt vs. equity	3
ii. earnings stripping rules	3
5. Distributions from US subsidiary	3
6. US-source payments where no US trade or business	2
7. Safe harbours for US investment activity	2
8. Anti-conduit rules	3
9. Foreign investment in US real property interests	3
D US tax treaties	
1. The OECD Model and the US Model	3
2. Limitation on benefits provisions	3
3. Provisions relating to hybrid entities	2
E Transfer pricing	
1. The US approach to transfer pricing	3
2. Cost-sharing for research and development	2
3. Global trading of securities	2
4. Transfer pricing of services and intangibles	2
F Cross-border mergers and acquisitions	
1. Tax-free reorganisations	2
2. Outbound reorganisations	2
3. Inbound reorganisations	2
4. Carryover of tax attributes, losses	2
G Foreign trusts	
1. Grantor trust rules	2
2. Non-grantor trusts and accumulated income	2
H Information reporting and information exchange	
1. Foreign Account Tax Compliance Act (FATCA)	2
2. Foreign bank account reporting and entity information returns	2
3. Exchange of information and cooperation between revenue authorities	1

II Federal Estate Tax

A Basic rules and concepts	
1. Domicile of individuals	2
2. Situs of assets	2
B Cross-border issues	
1. Transfers to non-resident alien beneficiaries	2
2. Relief of double taxation: estate tax treaties	2

III Federal Gift Tax

A Basic rules and concepts	
1. US persons and non-resident aliens	2
2. Situs of property for gift tax purposes	2
B Cross-border issues	
1. Transfers to non-resident aliens	2

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Any unannotated, bound hardcopy edition of the Internal Revenue Code and Treasury Regulations may be used.

CCH. *Internal Revenue Code* (Chicago: CCH, latest edition)
Available from CCH: www.cchgroup.com

CCH. *Income Tax Regulations* (Chicago: CCH, latest edition)
Available from CCH: www.cchgroup.com

Both available in the following publication:
Peroni, R. *International Income Taxation: Code and Regulations* (Chicago: CCH, latest edition)
Available from CCH: www.cchgroup.com

No other texts may be taken into the examination.

Essential Reading

Repetti, J., Ring, D. and Shay, S. *Introduction to United States International Taxation* (Alphen: Kluwer Law International, 7th edition, 2021) [ISBN: 9789403523859]
Available from Wildy & Sons: www.wildy.com

Schadewald, M. and Misey, R. *Practical Guide to US Taxation of International Transactions* (Chicago: CCH, 12th edition, 2020) [ISBN 9780808055310]
Available from Amazon: www.amazon.com

Additional Reading

Christensen III, H. *International Estate Planning* (New York: Matthew Bender, 2nd edition, 1999-, updated annually) [ISBN: 9780820514826]
Available from LexisNexis: www.lexisnexis.com

Herzfeld, M. *International Taxation in a Nutshell* (St Paul: West Publishing, 12th edition, 2019) [ISBN: 9781684673469]
Available from Amazon: www.amazon.com

Postlewaite, P., Sheffield, J., Tokic, G. and Weiss, M. *United States International Taxation* (Carolina Academic Press, 4th Edition, 2019) [ISBN: 9781531011185]
Available from Carolina Academic Press: www.cap-press.com

Postlewaite, P. and Weiss, M. *Tax Cuts and Jobs Act Impact - Guide to International Tax: Corporations* (CCH, 2018) [ISBN: 9780808049968]
Available from CCH: www.cchcpeblink.com

Streng, W. *US International Estate Planning* (Boston: Warren, Gorham & Lamont, 1996) [ISBN: 9780791326015]
Online version available from Thomson Reuters: <http://ria.thomson.com/Estore/detail.asp?ID=WUEPE>

Periodicals

Tax Notes International (Tax Analysts) [ISSN: 10483306]
Available from LexisNexis: www.lexisnexis.co.uk
Also available from Tax Analysts: www.taxanalysts.com

Tax Notes International Special Supplement - The Tax Cuts and Jobs Act: A Practitioner's Resource (Tax Analysts)
Available from Tax Analysts (subscription required): www.taxanalysts.com

MODULE 2.11 - BRAZIL OPTION

I	Jurisdiction to tax (including territoriality)	15%
II	Taxation of non-residents	25%
III	Taxation of individuals	10%
IV	Taxation of companies	25%
V	Tax planning	10%
VI	Tax treaties and international agreements	15%

I Jurisdiction to tax (including territoriality)

A	Brazilian sovereignty and the territoriality principle	1
B	The fiscal domicile concept in Brazilian tax legislation	3
C	The double tax treaty primacy rule	2

II Taxation of non-residents

A	General rules	3
B	Taxpayers	3
C	Income and capital gains	3
D	Exemptions, zero rates and tax reductions	1
E	Dividends	2
F	Capital and financial markets	2
G	Interest	2
H	Services	2
I	Royalties	2
J	International freight	1
K	International leasing	1
L	Withholding and collection	3

III Taxation of individuals

A	Tax residency	3
B	Worldwide income taxation principle for Brazilian residents	2
C	Dual residence under Brazil's double taxation treaties	1
D	Foreign tax credit	2
E	Income and capital gains	3

IV Taxation of companies

A	Tax residency	3
B	The worldwide income taxation principle for Brazilian companies	2
C	CFC rules	3
D	Dual fiscal residence under Brazil's double tax treaties	2
E	Taxation of non-resident entities	
	1. Foreign tax credit	1
	2. Permanent establishment	2
F	Transfer pricing	1
G	Thin capitalisation rules	1
H	Taxation of trusts and transparent entities	1

V Tax planning

A	The substance-over-form approach in Brazil	
	1. Treaty shopping prevention of BEPS in Brazil's domestic regulations	3
B	Impacts of the OECD/G20 BEPS Project on Brazil's tax policy	1

VI Tax treaties and international agreements

A	OECD and UN models	2
B	Brazil's international tax policy vis-a-vis the OECD and UN models	3
C	Exchange of information for tax purposes	1

RECOMMENDED READING LIST

Tax Legislation

Brazilian Federal Constitution

Available from Biblioteca Digital da Câmara dos Deputados:

<http://english.tse.jus.br/arquivos/federal-constitution>

Federal Tax Legislation

Service Tax Legislation

ICMS Legislation

Brazilian Double Taxation Treaties

Books

Bellan, D. V. *Direito Tributário Internacional: Rendimentos de Pessoas Físicas nos Tratados Internacionais Contra Dupla Tributação* (São Paulo: Saraiva, 2010) [ISBN: 9788502092495]
Available from Estante Virtual:
www.estantevirtual.com.br

Duarte Filho, P. *Double Tax Treaties Policies of Brazil: The Brazilian Model Convention* (São Paulo: Lumen Juris, 2018) [ISBN: 9788551907092]
Available from Estante Virtual:
www.estantevirtual.com.br

Rocha, S. A. *Manual de Direito Tributário Internacional* (São Paulo: Saraiva, 2012)
Available from Estante Virtual:
www.estantevirtual.com.br

Xavier, A. *Direito Tributário Internacional do Brasil* (Rio de Janeiro: Forense, 2015) [ISBN: 9788530944216]
Available from Estante Virtual:
www.estantevirtual.com.br

Additional Reading

Flavio Neto, L. and Polizelli, V. "Brazil", in Pistone, P. *IBFD Global topics - Global Tax Treaty Commentaries* (IBFD, 2022)

Rocha, S. A. *Tributação de Lucros Auferidos no Exterior* [Lei nº 12.973/2014]

Schoueri, L. E. *Preços de Transferência* [Lei nº 12.766/2012]

Online Resources

Income Tax Department of Brazil:
idg.receita.fazenda.gov.br

Ministry of Finance:
www.fazenda.gov.br

Mercosul:
www.mercosul.gov.br

MODULE 3.01 - EU DIRECT TAX OPTION

I	The legal background	10%
II	The harmonisation of direct taxes	20%
III	The tax jurisprudence of the ECJ relating to direct taxation	35%
IV	Administrative co-operation between revenue authorities in Europe	5%
V	The EU and international tax law	15%
VI	The state aid rules and taxation	10%
VII	The future direction of EU tax law	5%

I The legal background

A	The provisions of the TEU and the TFEU which are relevant to taxation	1
B	The EU institutions relevant to taxation	1
C	The hierarchy of EU and national tax regimes: possible approaches and implications for taxation	1
D	The Charter of Fundamental Rights and its application to taxpayers	1

II The harmonisation of direct taxes

A	Important direct tax directives (Parent-Subsidiary Directive, Merger Directive, Interest and Royalties Directive, Anti-Tax Avoidance Directive, Double Taxation Dispute Resolution Mechanisms Directive)	3
B	Pending and proposed directives including CCTB/CCCTB and taxation of the digital economy	1

III The jurisprudence of the ECJ relevant to direct taxation

A	The concept of 'restriction'	3
B	Comparability and discrimination	3
C	The concept of proportionality	3
D	Derogations, justifications and the exercise of sovereignty	3
E	Abuse of law	3
F	The relationship with non-member countries	2

IV Administrative co-operation between revenue authorities in Europe

A	The Mutual Assistance Directive for the Recovery of Taxes	1
B	The Directive on Administrative Cooperation	3

V The EU and international tax law

A	The EU and double taxation conventions, including the relevant jurisprudence of the Court of Justice	1
B	The EU and international tax avoidance and evasion	1
C	The EU and the OECD/G20's BEPS project	2
D	The EU and Good Tax Governance	2

VI The state aid rules and taxation

A	The application of the State Aid rules to taxation, with particular reference to the decisions of the Court of Justice	2
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VII The future directions of EU tax law

A	Current developments	2
B	Future policy directions	1

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following text only into the examination:

Van Raad, K. *Materials on International, TP and EU Tax Law 2018-2019*. Volumes C1 and C2 (Leiden: International Tax Centre, 2018)
Available from the International Tax Centre at Leiden University:
www.itc-leiden.nl or b.bosman@itc-leiden.nl
Or available from Wildy & Sons: www.wildy.com

Candidates with a 2016-2017 edition may instead take Volume C of the earlier edition into the examination.

No other texts may be taken into the examination.

Books

There are several good books that cover the subject matter of this module:

Helminen, M. *EU Tax Law: Direct Taxation 2021* (Amsterdam: IBFD, 2021) [ISBN: 9789087227241]
Available from IBFD: www.ibfd.org

HJI Panayi, C. *European Union Corporate Tax Law* (Cambridge: Cambridge University Press, 2nd edition, 2021) [ISBN: 9781108839020]
Available from Cambridge University Press:
www.cambridge.org/gb/academic

O'Shea, T. *Understanding EU Tax 2020* (London: Avoir Fiscal, 2020) [ISBN: 9780955916465]
Available from Amazon: www.amazon.com

Terra, B. and Wattel, P. *European Tax Law*. Volume 1 (Kluwer, 7th edition, 2018) [ISBN: 9789013133592].
Available from Amazon: www.amazon.com

Periodicals

Bulletin of the International Bureau of Fiscal Documentation (Amsterdam: IBFD) [ISSN: 00074624]
Available from IBFD: www.ibfd.org

EC Tax Journal (Key Haven Publications) [ISSN: 13501089]

Available from Key Haven Publications:
www.khplc.co.uk

EC Tax Review (New York: Kluwer Law International) [ISBN: 9789880007408]

Published together with Intertax.
Available from Kluwer Law International:
www.kluwerlawonline.com

European Taxation (Amsterdam: IBFD) [ISSN: 00143138]. Also known as *ET*.

Available from IBFD: www.ibfd.org

Highlights and Insights on European Taxation (Deventer: Kluwer Law International) [ISSN: 10134764]

Available from Kluwer Law International:
<http://shop.kluwer.nl>

Tax Notes International (Tax Analysts) [ISSN: 10483306]

Available from LexisNexis: www.lexisnexis.co.uk
Also available from Tax Analysts: www.taxanalysts.com

Case Law

Candidates should regularly check the European Court of Justice database for new tax cases:
<http://curia.europa.eu/juris/recherche.jsf?language=en>

The following list of cases from the database will be of interest to candidates:
https://ec.europa.eu/taxation_customs/sites/taxation/files/20191212_court_cases_direct_taxation_en.pdf

European Commission Taxation and Customs Union:
http://ec.europa.eu/taxation_customs/index_en.htm

Additional Reading

Treaty on the Functioning of the European Union

Available from EUR-Lex:
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A12012E%2FTXT>

MODULE 3.02 - EU VAT OPTION

I	Fundamental concepts	15%
II	The scope of EU VAT	10%
III	Place of taxable transactions	20%
IV	The charge to VAT: time of supply, valuation and rates	15%
V	Exemptions	10%
VI	The right to deduct input tax	15%
VII	Administration of VAT	15%

I Fundamental concepts

A	Sources of law	
	1. Treaty on the Functioning of the European Union (articles relating to VAT and indirect taxes)	1
	2. Development of VAT law from First Directive to 2006	1
	3. Principal VAT Directive 2006/112 as amended	3
	4. Implementing Regulation 282/2011/EU as amended	3
	5. Other Directives relevant to VAT	1
	6. Other Regulations relevant to VAT, e.g. Regulation 904/2010/EU relating to Administrative Cooperation	1
	7. The role of Commission and Council in relation to VAT	1
B	EU law principles	
	1. Fundamental freedoms	1
	2. Fiscal neutrality, equal treatment	3
	3. Equivalence, effectiveness	3
	4. Legal certainty, legitimate expectations	3
	5. Proportionality, fundamental human rights	3
	6. Abuse of rights, abusive practices	3
	7. Acquis communautaire (body of statute and case law of the EU)	1
	8. Direct effect of Directives	3
	9. Conforming construction of national law	3
C	Judicial remedies	
	1. Role of the Court of Justice of the European Union in relation to VAT	3
	2. Infringement proceedings against member states	2
	3. Referrals under Article 267, TFEU	2
	4. Claims for damages	1
	5. Methods of interpretation: purposive construction	2
	6. Acte clair (Cilfit) and Acte éclairé (Da Costa)	1

II The scope of EU VAT

A	Chargeable events	
	1. Supply, importation and intra-Community acquisition	3
	2. Origin and destination system	1
	3. Relevance of legality of transactions or fraudulent intent	2
B	Territorial scope	
	1. VAT territory, customs territory, special territories	1

C	Taxable person	
1.	Economic activity	3
2.	Passive or private activities	2
3.	Public authorities	1
4.	Occasional transactions	1
5.	VAT grouping (single taxable person)	2
D	Taxable transaction	
1.	“Supply of goods” and “supply of services”	3
2.	Supply for consideration	3
3.	Classification of supplies as goods or services	3
4.	Compound/single and multiple/mixed supplies	3
5.	Deemed supplies, including intra-Community transfers	3
6.	Deemed non-supplies (transfer of going concern)	3
7.	Self-supplies	1
8.	Acting as an agent	2

III Place of taxable transactions

A	Place of supply of goods: general rules and exceptions	3
B	Place of intra-Community acquisitions	3
C	Place of importations	3
D	Place of supply of services: business to business: general rule and exceptions	3
E	Place of supply of services: business to consumer: general rule and exceptions	3
F	Place of establishment and ‘other fixed establishment’	3

IV The charge to VAT

A	Chargeable event	
1.	Timing of charge on supplies	3
2.	Alternative rules: continuous supplies, link to payment	2
3.	Timing of intra-Community acquisitions	2
4.	Timing of importations	2
5.	Timing of charge on intra-Community supplies of services	2
B	Taxable amount	
1.	Valuation rules: consideration	3
2.	Specific items to be included or excluded from taxable amount	2
3.	Barter transactions	2
4.	Use of open market value: anti-avoidance provisions	2
5.	Valuation of intra-Community acquisitions	3
6.	Valuation of importations	3
7.	Adjustment for non-receipt	3
C	VAT rates	
1.	Structure and level of rates	2
2.	Lower rates	2
3.	Transitional provisions for rates retained by member states	1

V Exemptions

1.	General principles of exemption: strict construction, mandatory where applicable, conditions and scope for member states to vary rules	3
2.	Exemptions within the territory: in the public interest	3

3. Exemptions within the territory: other exemptions	3
4. Option to tax certain exempt transactions	2
5. Exemptions for despatches of goods within the EU	3
6. Exemptions for intra-Community acquisitions of goods	2
7. Triangular transactions	3
8. Exemptions for exports of goods	3
9. Exemptions on importation	2
10. Other exemptions related to international trade	1

VI The right to deduct input tax

1. The basic right to deduct	3
2. Partial exemption: standard and 'special' or alternative methods	3
3. Irrecoverable input tax	2
4. Transitional provisions retaining 'blocking' of input tax	1
5. Adjustment of recovery: change of circumstances	3
6. Adjustment of recovery: capital goods	3
7. Exercise of the right to deduct, including requirements for evidence	2

VII Administration of VAT

A Obligations on taxable persons	
1. Identification and registration	1
2. Invoicing, accounting, returns and recapitulative statements	1
3. Special schemes for small enterprises	1
4. Margin schemes for tour operators, second hand goods	1
5. Special schemes for taxation of telecommunications, electronic and broadcasting services	2
6. Other special schemes	1
B Derogations	
1. Transitional derogations allowed until definitive arrangements agreed	1
2. General scheme of derogations subject to authorisations	1
C Miscellaneous VAT provisions	
1. Role of the VAT Committee and VAT Expert Group (VEG)	1
2. Prohibition of other turnover taxes	1
3. Transitional arrangements regarding intra-Community trade	1
4. Proposals for a definitive VAT regime	1
D Cross-Border VAT claims: claimant established in the EU	
1. Rules and procedures of Directive 2008/9/EC	1
E Cross-Border VAT claims: claimant established outside the EU	
1. Rules and procedures of Directive 86/560/EEC (The 13th VAT Directive)	1
F Trading of goods	
1. Community statistics relating to the trading of goods (Regulation 638/2004/EC)	1
2. The One-Stop-Shop (OSS) and Import One-Stop-Shop (IOSS)	2

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts **only** into the examination:

Cordara, R. *Tolley's Orange Tax Handbook 2022-2023* (LexisNexis, 2022) [ISBN: 9781474320733]
Available from LexisNexis: www.lexisnexis.co.uk
(Discount available for registered ADIT students at www.tolley.co.uk/purchase?id=2&pc=ADIT_ET&step=2)

Terra, B. and Kajus, J. *A Guide to the European VAT Directives 2022*. Volume 2 (IBFD, 2022) [ISBN: 9789087227579]
Available from IBFD: www.ibfd.org

No other texts may be taken into the examination.

Essential Reading

Council Directive 2006/112/EC: the Principal VAT Directive
Available from EUR-Lex:
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006L0112&from=EN>

Council Directive 86/560/EEC: the 13th VAT Directive
Available from EUR-Lex:
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31986L0560&from=EN>

Council Directive 2008/9/EC: Electronic System of VAT Refunds
Available from EUR-Lex:
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:044:0023:0028:EN:PDF>

Council Implementing Regulation 282/2011/EU
Available from EUR-Lex:
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2011:077:FULL&from=EN>

European Parliament & Council Regulation 638/2004/EC
Available from EUR-Lex:
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32004R0638&from=EN>

The materials listed above are also included in the following permitted book:

Cordara, R. *Tolley's Orange Tax Handbook 2022-2023*. Part 1 (LexisNexis, 2022) [ISBN: 9781474320733]

Annacondia, F. *EU VAT Compass 2022-2023* (IBFD, 2022) [ISBN: 9789087227531]
Available from IBFD: www.ibfd.org

Lang, M. et al. *ECJ - Recent Developments in Value Added Tax: the Evolution of European VAT Jurisprudence and its Role in the EU Common VAT System* (Linde Verlag, 2014) [ISBN: 9783707327533]
Available from Booklooker: www.booklooker.de

Terra, B. and Kajus, J. *A Guide to the European VAT Directives 2022* (IBFD, 2022) [ISBN: 9789087227562 (Volume 1); 9789087227579 (Volume 2)]

Additional Reading

Accountancy Europe. *Modernising VAT: EU Policy Developments* (Accountancy Europe, 2019) [ISBN: 9789041122421]
Available from Accountancy Europe:
www.accountancyeurope.eu/publications/modernising-vat

European Commission Action Plan on VAT
Available from the European Commission:
https://ec.europa.eu/taxation_customs/business/vat/action-plan-vat_en

European Commission Group on the Future of VAT
Available from the European Commission:
https://ec.europa.eu/taxation_customs/business/vat/informal-commission-expert-group-discussions-with-member-states_en

Online Resources

EU law, including case law, can be found at EUR-Lex:
<http://eur-lex.europa.eu/browse/summaries.html>

Information for VAT professionals and students about the *Principal VAT Directive*, and its implications for businesses trading with or within the EU, can be found at: www.vatdirective.com

Croner-i Green VAT Legislation

Available from Croner-i:

<https://library.croneri.co.uk/green>

MODULE 3.03 - TRANSFER PRICING OPTION

I	Fundamental sources	15%
II	The arm's length principle (ALP)	5%
III	Functional analysis	10%
IV	Transfer pricing methods	10%
V	Comparability	10%
VI	Specific transactions	15%
VII	Permanent establishments (PEs)	10%
VIII	Compliance issues	5%
IX	Avoiding Double Taxation and dispute resolution	10%
X	Other issues	10%

I Fundamental sources

A	Tax treaties, based on the OECD Model Convention and UN Model Convention, specifically Article 9 and "special relationship" in Articles 10-12	3
B	OECD Transfer Pricing Guidelines	3
C	OECD BEPS 2015 Final Reports (Actions 8-10): Aligning transfer pricing outcomes with value creation	2
D	UN Practical Manual on Transfer Pricing for Developing Countries 2021	2
E	Transfer pricing litigation cases (refer to the reading list)	3
F	EUJTPF Codes of Conduct guidelines and reports	2

II The arm's length principle (ALP)

A	Interpretation of the arm's length principle and current dialogue	3
B	Associated enterprises	3
C	Global Formulary Apportionment	1
D	Recognition of the actual transactions undertaken	2
E	Losses and the effect of government policy	2

III Functional analysis

A	The goal of functional analysis	1
B	Analysis of functions, assets and risks (FAR)	3
C	Relating functional analysis to selection of transfer pricing method	3
D	Entity characterisation (e.g. characterisation as "entrepreneur", stripped risk manufacturer, commissionaire, etc.)	2
E	The practical approach to undertaking functional analysis	3

IV Transfer pricing methods

A	Description of methods	2
B	Selection and application of the method(s) (including by reference to FAR analysis, entity characterisation and availability of comparables); the party to be tested	3

V Comparability

A	The significance of comparability and factors determining comparability	3
B	Performing a comparability analysis	3
C	Dealing with the lack of comparable data	2
D	Sources of information: internal/external comparables; “secret comparables”, foreign comparables	2
E	Timing and compliance issues in comparability	2

VI Specific transactions

A	Intra-group services	
1.	Different types of intra-group services	3
2.	Transfer pricing methods	3
3.	Direct/indirect charging and allocation keys	3
4.	International guidelines on reviewing services	2
B	Intra-group financial transactions	
1.	Intragroup loans, credit guarantee fees, factoring or receivables, cash pooling, and other forms of financing and credit risk transfer arrangements	3
2.	Loan pricing including creditworthiness, interest rates and credit margins	2
3.	Thin capitalisation rules and the nexus with transfer pricing	3
4.	Debt pricing and/or debt amounts that result in ongoing losses or low levels of profitability	2
C	Intangible property	
1.	The life cycle of intangibles (development, exploitation, exit strategy)	1
2.	Different types of intangibles	2
3.	Models to structure the development of intangibles (e.g. contract research and development vs. cost contribution/cost sharing arrangements)	3
4.	Models for exploiting intangibles: for example principal structure vs. licensing out	3
5.	Valuation of intangible assets	3
6.	Current developments on transfer pricing aspects of intangibles	2
D	Business restructurings	
1.	The nature of business restructuring	1
2.	Guidance on transfer pricing aspects of business restructurings including Chapter IX of the OECD TPG)	3
E	Cost contribution arrangements (CCAs)	
1.	Concept of a CCA including entry, withdrawal or termination	3
2.	Applying the ALP in a CCA	3
3.	Tax consequences if a CCA is not arm’s length	1
4.	Structuring and documenting a CCA	2

VII Permanent establishments (PEs)

A	Article 5: Permanent establishments (OECD and UN Models)	1
B	Article 7: Business profits (OECD and UN Models)	2
C	Understanding the importance of PEs when dealing with transfer pricing	3

VIII Compliance issues

A	Documentation	3
1.	OECD BEPS 2015 Final Reports (Action 13)	3
2.	Country by country reporting, master and local file documentation formats	3
B	Examination practices, burden of proof and penalties	2
C	Risk assessment and risk management	3
D	Audits	1

IX **Avoiding Double Taxation and dispute resolution**

A	Adjustments	3
B	Mutual agreement procedure, including OECD BEPS 2015 Final Reports (Action 14)	3
C	Arbitration: Article 25(5)	2
D	EU Arbitration Convention	1
E	Advance pricing agreements (APAs)	3

X **Other issues**

A	OECD/G20 Base Erosion and Profit Shifting (BEPS) Project	3
B	Interaction between customs valuation and transfer pricing	2
C	Safe harbours and tax incentives	2
D	E-commerce and transfer pricing	2
E	Worldwide recent developments in transfer pricing	2

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts **only into the examination**:

OECD, Committee on Fiscal Affairs. *Model Tax Convention on Income and on Capital* (Paris: OECD, 2017) [ISBN: 9789264287945] and accompanying Commentary: Article 5, Article 7, Article 9, and “special relationship” in Articles 10-12
Available from the OECD: www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *OECD/G20 Base Erosion and Profit Shifting Project 2015 Final Reports. Actions 8-10* (Paris: OECD, 2015)
[ISBN: 9789264241237]

OECD, Committee on Fiscal Affairs. *OECD/G20 Base Erosion and Profit Shifting Project 2015 Final Reports. Action 13* (Paris: OECD, 2015) [ISBN: 9789264241466]
Available from the OECD:
www.oecd.org/ctp/beps-2015-final-reports.htm

OECD, Committee on Fiscal Affairs. *Report on the Attribution of Profits to Permanent Establishments* (Paris: OECD, 2010)
Available from the OECD: www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *Transfer Pricing Guidance on Financial Transactions: Inclusive Framework on BEPS. Actions 4, 8-10* (Paris: OECD, 2020)
Available from the OECD: www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations* (Paris: OECD, 2022)
[ISBN: 9789264526914]
Available from the OECD: www.oecd-ilibrary.org

United Nations. *UN Model Double Taxation Convention between Developed and Developing Countries 2021*. (New York: UN, 2021) [ISBN: 9789212591841]
Available from the United Nations: www.un.org

United Nations. *UN Practical Manual on Transfer Pricing for Developing Countries 2021* (New York: UN, 2021) [ISBN: 9789212591858]
Available from the United Nations: www.un.org

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volume A (Leiden: International Tax Centre, 2020) [ISBN: 9789082585452]

Candidates with a pre-2016 edition may instead take Volume 1 of the earlier edition into the examination. Available from the International Tax Centre at Leiden University:

www.itc-leiden.nl or b.bosman@itc-leiden.nl

Or available from Wildy & Sons: www.wildy.com

No other texts may be taken into the examination.

Additional Reading

Andrus, J.L. and Collier, R. *Transfer Pricing and the Arm's Length Principle After BEPS* (Oxford University Press, 2018) [ISBN: 9780198802914]
Available from Oxford University Press: global.oup.com

Donegan, R. and Henshall, J. *Global Transfer Pricing: Principles and Practice* (Bloomsbury Professional, 4th edition, 2019) [ISBN: 9781526511218]
Available from Bloomsbury Professional:
www.bloomsburyprofessional.com

EY. *EY Worldwide Transfer Pricing Reference Guide 2020-2021* (EY, 2021)
Available from EY:
www.ey.com/en_gl/tax-guides/worldwide-transfer-pricing-reference-guide-2020

Konrad, K. A. and Schön, W. *Fundamentals of International Transfer Pricing in Law and Economics* (Springer, 2nd edition, 2014) [ISBN: 9783642434280]
Available from Blackwells:
<https://blackwells.co.uk/bookshop>

Lang, M. et al. *Fundamentals of Transfer Pricing: A Practical Guide* (Kluwer Law International, 2nd edition, 2019) [ISBN: 9789041189943]
Available from Wolters Kluwer:
<https://lrus.wolterskluwer.com/store>

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volume B (Leiden: International Tax Centre, 2020)

Available from the International Tax Centre at Leiden University:

www.itc-leiden.nl or b.bosman@itc-leiden.nl

Or available from Wildy & Sons: www.wildy.com

The following texts may also be considered useful for candidates in understanding the post-BEPS environment. However, familiarity with these texts is not required to sit and pass the exam:

Lolliri, F. *Transfer Pricing Risks Post-BEPS: a Practical Guide* (LexisNexis, 2017) [ISBN: 9780754554639]

Available from LexisNexis:

<https://store.lexisnexis.co.uk> (Discount available for registered ADIT students)

Lang, M. and Petrucci, R. *Transfer Pricing Developments Around the World 2021* (Kluwer Law International, 2021) [ISBN: 9789403535258]

Available from Wolters Kluwer:

<https://irus.wolterskluwer.com/store>

Lang, M., Petrucci, R. and Storck, A. *Transfer Pricing in a Post-BEPS World* (Kluwer Law International, 2016) [ISBN: 9789041167101]

Available from Wolters Kluwer:

<https://irus.wolterskluwer.com/store>

OECD. *Additional Guidance on the Attribution of Profits to a Permanent Establishment* (OECD 2018)

Available from OECD: www.oecd.org

OECD. *Guidance on the Implementation of Country-by-Country Reporting* (OECD 2018)

Available from OECD: www.oecd.org

OECD. *Guidance on the Appropriate Use of Information Contained in CbC Reports* (OECD 2018)

Available from OECD: www.oecd.org

Case Law

The following court decisions:

- Apple Sales International and Apple Operations Europe v Commission [T-892/16] and Ireland v

Commission [T-778/16]

- Cameco Corporation [2020 FCA 112]
- Chevron Australia Holdings Pty Ltd [2017 FCAFC 62]
- DSG [2009 UKFTT 31 (TC)]
- GE Capital [2010 FCA 344]
- GSK Canada [2010 FCA 201]
- Glencore [2020 FCAFC 187]
- LG Electronics India Pvt Ltd v ACIT [2013 29 taxmann.com 300]
- Roche Products Property [2008 AATA 261]
- SNF (Australia) Pty Ltd [Single Federal Court Decision, 2010 FCA 635]
- SNF (Australia) Pty Ltd [Full Federal Court Decision, 2011 FCAFC 74]
- Unilever Kenya [Income Tax Appeal 753 of 2003]

Online Resources

EU Joint Transfer Pricing Forum:

https://ec.europa.eu/taxation_customs/business/company-tax/transfer-pricing-eu-context/joint-transfer-pricing-forum_en

Candidates should read the following sections:

1. Background, achievements
2. Code of conduct on transfer pricing documentation for associated enterprises in the EU
3. Guidelines for advance pricing agreements (APAs) in the EU
4. Guidelines on low-value-adding intra-group services
5. Potential approaches to non-EU triangular cases
6. Report on small and medium enterprises (SMEs) and transfer pricing
7. Report on cost contribution arrangements on services not creating intangible property
8. Report on secondary adjustments
9. Report on transfer pricing risk management
10. Report on compensating adjustments
11. Report on the application of the profit split method within the EU

OECD BEPS page:

www.oecd.org/ctp/beps.htm

OECD Transfer Pricing page:

www.oecd.org/ctp/tp

Candidates should read documents relevant to the syllabus within the “What’s New” and “Transfer Pricing Projects” sections.

Pacific Association of Tax Administrators (PATA) Transfer Pricing Documentation Package:

www.ustransferpricing.com/PATA_transferpricingpackage.pdf

United Nations: www.un.org/esa/ffd

Candidates should read documents relevant to the syllabus within the “Transfer Pricing” and “BEPS” thematic areas.

MODULE 3.04 - ENERGY RESOURCES OPTION

I	Fundamental tax issues	5%
II	Tax and fiscal regimes	15%
III	Country tax examples	5%
IV	Permanent establishments	10%
V	Technical services	10%
VI	Mergers and acquisitions	5%
VII	Intellectual Property (IP)	5%
VIII	Leasing	5%
IX	Financing	5%
X	Profit repatriation	5%
XI	Trading	2.5%
XII	Transfer pricing	5%
XIII	Governance of natural energy resources	5%
XIV	Arbitration of disputes	2.5%
XV	Tax issues relating to decommissioning of assets	5%
XVI	Tax policy considerations of climate change	10%

I Fundamental tax issues

A	International investment	1
B	International income flows	1
C	Tax treaties	2
D	Transfer pricing	2

II Tax and fiscal regimes

A	Licence and concession regimes	3
B	Production sharing contracts (PSCs)	3
C	Service contracts	3
D	Royalties	3
E	Indirect taxes, including VAT and qualifying for exemptions	2
F	Deferred tax accounting issues	1

III Country tax examples

A	Angola	1
B	Brazil	1
C	Indonesia	1
D	Iraq, technical service contracts (TSCs), and development and production service contracts (DPSCs)	1
E	Nigeria	1
F	Norway	1
G	United Kingdom	1
H	United States (federal taxation)	1
I	United States (state taxation generally, includes focus on Texas and Alaska)	1

IV Permanent establishments

A	Permanent establishments and tax treaties	2
B	Operating companies	2
C	Service companies	2

V Technical services

A	Technical services background	2
B	Structuring technical service operations	2
C	Interaction with PSCs and joint operating agreements	3
D	Withholding tax and related planning	3

VI Mergers and acquisitions

A	Acquire target assets or target company shares	2
B	Interest deductions and debt push down	2
C	Depreciation and asset step up	2
D	Carry-forward tax losses	2
E	Sale and purchase agreements	3
F	Cost carry deals	3
G	Tax due diligence	3

VII Intellectual Property (IP)

A	IP in natural energy resources	2
B	Royalties	2
C	Transfers of IP	2
D	Group IP companies	2

VIII Leasing

A	Operating leasing	2
B	Leasing and tax treaties	1
C	Sale and leaseback	1
D	Group leasing companies	1

IX Financing

A	Group treasury companies and in-house banking	2
B	Thin capitalisation	1
C	Controlled foreign corporations	1
D	Hybrid entities and hybrid securities	1

X Profit repatriation

A	Subsidiaries and dividends	2
B	Subsidiaries and deductible expenses	1
C	Branches and profit repatriation	1
D	Branches and allocation of related company expenses	2

XI Trading

A	Group trading company	2
B	Planning structures	1
C	Derivatives, including options, forwards and swaps	1

XII Transfer pricing

A	Transfer pricing methods and advance pricing agreements (APAs)	2
B	Commodity pricing	2
C	Exploration services and drilling	1
D	Financial and environmental guarantees	2
E	Transfer pricing and procurement	2
F	Transfer pricing and trading	3
G	Intellectual property	2
H	Services and administration	2
I	Group financing	2

XIII Governance of natural energy resources

A	Definition and characteristics of the types of natural energy resource governance	
	1. Proprietary regime	1
	2. Non-proprietary regime	1
B	The link between international agreements and different types of natural resource governance	2
C	The effects of using certain types of governance on government tax receipts	2

XIV Arbitration of disputes

A	The use of arbitration by natural energy resource companies	2
B	Bilateral investment treaties and the Energy Charter Treaty	2
C	Arbitration clauses in contracts	1

XV Tax issues relating to decommissioning of assets

A	International legal regulations and obligations regarding decommissioning of structures	2
B	Tax treatment of decommissioning costs in merger and acquisition	2
C	UK decommissioning tax relief	2

XVI Tax policy considerations of climate change

A	The importance of carbon pricing and carbon capture, use and storage (CCUS)	2
B	Design and implementation of carbon taxation	2
C	Design and implementation of emissions trading schemes (ETS)	2
D	Tax aspects of CCUS	2

RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

Abdo, H. *Taxation of UK Oil and Gas Production: a Non-Proprietorial Regime?* (Oxford: Lambert Academic Publishing, 2010) [ISBN: 9783843375917]
Available from Amazon: www.amazon.com

OECD, Committee on Fiscal Affairs. *Model Tax Convention on Income and on Capital* (Paris: OECD, 2017) [ISBN: 9789264287945] and accompanying *Commentary*
Available from the OECD: www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations* (Paris: OECD, 2022) [ISBN: 9789264526914]
Available from the OECD: www.oecd-ilibrary.org

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volume A (Leiden: International Tax Centre, 2020) [ISBN: 9789082585452]
Candidates with a pre-2016 edition may instead take Volume 1 of the earlier edition into the examination.
Available from the International Tax Centre at Leiden University:
www.itc-leiden.nl or b.bosman@itc-leiden.nl
Or available from Wildy & Sons: www.wildy.com

No other texts may be taken into the examination.

Essential Reading

Abrahamson, J. *Tolley's International Taxation of Upstream Oil and Gas* (LexisNexis, 3rd edition, 2021) [ISBN: 9780754558118]
Available from LexisNexis: www.lexisnexis.co.uk
(Discount available for registered ADIT students; to access the discount, please click [here](#).)

Angola. *Model Production Sharing Agreement* (1969)
Available from EI Source Book:
www.eisourcebook.org/cms/Angolan%20Production%20Sharing%20Agreement.pdf

Calder, J. *Administering Fiscal Regimes for Extractive Industries: A Handbook* (IMF, 2014) [ISBN: 9781475575170]
Available from the IMF eLibrary: www.elibrary.imf.org

Daniel, P., Keen, M., Świstak, A. and Thuronyi, V. *International Taxation and the Extractive Industries* (Routledge, 2019) [ISBN: 9780367875077]
Available from Routledge:
www.routledge.com

Daniel, P., Keen, M. and McPherson, C. *The Taxation of Petroleum and Minerals* (Routledge, 2010) [ISBN: 9780415781381]
Available from Routledge:
www.routledge.com

Deloitte. *Oil and Gas Taxation in the UK: Deloitte Taxation and Investment Guides* (London: Deloitte, 2013), pp. 3-6
Available from Deloitte:
www2.deloitte.com/content/dam/deloitte/global/documents/energy-and-resources/dttl-er-uk-oilandgas-guide.pdf

European Union. *EU Emissions Trading System (EU ETS)* and related publications on the website
Available from the EU:
https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets_en

EY. *2019 Global Oil and Gas Tax Guide* (London: EY, 2019)
Available from EY:
www.ey.com/en_gl/tax-guides/global-oil-and-gas-tax-guide-2019

HMRC. *Oil and Gas Companies: Tax Relief for Decommissioning Expenditure* (London: HMRC, 2016)
Available from HMRC:
www.gov.uk/government/publications/oil-and-gas-companies-tax-relief-for-decommissioning-expenditure/oil-and-gas-companies-tax-relief-for-decommissioning-expenditure

Indonesian Ministry of Energy and Mineral Resources (MEMR). *Regulation No. 8 of 2017 regarding the Gross Split for Production Sharing Contracts* (MEMR Regulation 8/2017)

Available from the Indonesian Petroleum Association: www.ipa.or.id/assets/images/news/20170119%20ipa%20-%20permen%2008%202017%20original_eng%20final.pdf

Iraq. *Model Producing Oil Field Technical Service Contract* (2009)

Available from Platform: <http://platformlondon.org/documents/pftsc-23-apr-09.pdf>

Mommer, B. *Global Oil and the Nation State* (Oxford: Oxford University Press, 2002) [ISBN: 9780197300282]
Available from Amazon: www.amazon.com

Nakhle, C. *Petroleum Taxation: Sharing the Oil Wealth* (London: Routledge, 2008) [ISBN: 9780415541909]
Available from Routledge: www.routledge.com/books

United Nations. *United Nations Handbook on Carbon Taxation for Developing Countries* (UN, 2021) and related publications on the website
Available from the UN: www.un.org/development/desa/financing/what-we-do/ECOSOC/tax-committee/thematic-areas/environmental-taxation

World Bank. *Carbon Pricing Dashboard* (World Bank, 2021) and related publications on the website
Available from the World Bank: <https://carbonpricingdashboard.worldbank.org>

Other Relevant Reading

Abdo, H. "Investigating the effectiveness of different forms of mineral resources governance in meeting the objectives of the UK petroleum fiscal regime", in *Energy Policy* (2014, Volume 65, p.48)
Available at ScienceDirect: www.sciencedirect.com/science/journal/03014215/65

Andah, E. and Ike, C. "Nigeria - Value Added Tax and the Oil and Gas Industry in Nigeria", in *International VAT Monitor* (2017, Volume 28:1)

Available from IBFD: www.ibfd.org/IBFD-Products/Journal-Articles/International-VAT-Monitor/collections/ivm/html/ivm_2017_01_ng_1.html

Blyschak, P. "Arbitrating overseas oil and gas disputes: breaches of contract versus breaches of treaty", in *Journal of International Arbitration* (2010, Volume 27:6)

Available from Kluwer Law Online: www.kluwerlawonline.com

Daniel, P., Keen, M. and McPherson, C. (eds). *The Taxation of Petroleum and Minerals: Principles, Problems and Practice* (Routledge, 2010) [ISBN: 9780415569217]

Available from Routledge: www.routledge.com

Daniel, P., Keen, M., Świstak, A. and Thuronyi, V. (eds). *International Taxation and the Extractive Industries* (Routledge, 2019) [ISBN: 9780367875077]

Available from Routledge: www.routledge.com

EY. *EY Worldwide Transfer Pricing Reference Guide 2019-2020* (EY, 2020)

Available from EY: www.ey.com/en_gl/tax-guides/worldwide-transfer-pricing-reference-guide-2020

EY. *US GAAP vs. IFRS – The Basics: Oil and Gas* (London: EY, 2016)

Available from EY: www.ey.com/au/ul/en/accountinglink/publications-library-us-gaap-vs--ifrs--the-basics

IMF. *Fiscal Regimes for Extractive Industries: Design and Implementation* (IMF, 2012)

Available from the IMF: www.imf.org/external/np/pp/eng/2012/081512.pdf

Johnston, D. and Johnston, D. “Fundamental petroleum fiscal considerations”, in *Oxford Energy Comment* (February 2015)

Available from the Oxford Institute for Energy Studies:
www.oxfordenergy.org/wpcms/wp-content/uploads/2015/02/Fundamental-Petroleum-Fiscal-Considerations.pdf

Kobetsky, M. *International Taxation of Permanent Establishments: Principles and Policy* (Cambridge University Press, 2011) [ISBN: 9780511977855]
Available from Cambridge University Press:
www.cambridge.org/gb/academic

Mazeel, M. *Petroleum Fiscal Systems and Contracts* (Diplomica Verlag, 2010) [ISBN: 9783836688529]
Available from AbeBooks: www.abebooks.co.uk

OECD, Committee on Fiscal Affairs. *OECD/G20 Base Erosion and Profit Shifting Project 2015 Final Reports. Action 13* (Paris: OECD, 2015) [ISBN: 9789264241466]

OECD, *Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting* (OECD, 2016)
Available from OECD: www.oecd.org

PwC. *Financial Reporting in the Oil and Gas Industry: International Financial Reporting Standards* (London: PwC, 2017)
Available from PwC:
www.pwc.com/gx/en/services/audit-assurance/assets/pwc-financial-reporting-in-the-oil-and-gas-industry-2017.pdf

Samuelsen, J. *A Guide to Norwegian Petroleum Taxation* (Oslo: KPMG, 2011) [ISBN: 9788292222096]
Available from KPMG:
www.kpmglaw.no/artikkel/a-guide-to-norwegian-petroleum-taxation

United Nations. *United Nations Handbook on Selected Issues for Taxation of the Extractive Industries by Developing Countries* (UN, 2017) [ISBN: 9789210478472]
Available from the UN:
www.un.org/esa/ffd/wp-content/uploads/2018/05/Extractives-Handbook_2017.pdf

Wälde, T. “Arbitration in the oil, gas and energy field: emerging energy charter treaty practice”, in *Transnational Dispute Management* (2004, Volume 1:2)
Available from Transnational Dispute Management:
www.transnational-dispute-management.com

Wälde, T. “Oil and gas arbitration: some historical background and current significance”, in *Transnational Dispute Management* (2006, Volume 3:5)
Available from Transnational Dispute Management:
www.transnational-dispute-management.com

MODULE 3.05 - BANKING OPTION

I	Fundamental tax issues	10%
II	Tax implications of bank operating models and capital/funding allocations	20%
III	Tax implications for banking activities	20%
IV	Transaction taxes and withholding taxes	20%
V	Bank levy	5%
VI	Client tax reporting	20%
VII	The OECD context	5%

I Fundamental tax issues

A	Residence	1
B	Permanent establishments	1
C	Beneficial ownership and withholding tax	1
D	Double tax relief	1
E	Transfer Pricing and thin capitalisation	1
F	General Anti-Abuse Rule (GAAR)	1

II Tax implications of bank operating models and capital/funding allocations

A	Tax considerations for using different operating models (e.g. representative offices, branches, subsidiaries)	3
B	OECD guidelines for attribution of profits to branches, with specific reference to the guidelines for banking and financial trading business, and related bank internal derivatives	3
C	Tax considerations for the treatment of different types of capital instrument, e.g. Common Equity Tier One, Alternative Tier One, Tier Two, and hybrid capital	2
D	Attribution of capital to banking branches	2

III Tax implications for banking activities

A	Global developments in banking taxation code of conduct and tax transparency; UK Code of Conduct for Banks; Australian Tax Transparency Code for Large Businesses	3
B	Cross-border tax considerations when loan assets are originated, transferred between entities or branches within a banking group, restructured (e.g. non-performing loans). Tax considerations for the change of domicile by borrowers, or the cross-border sale of loan assets between creditors	2
C	LMA documentation and tax clauses. Sub-participation and risk sharing within a banking group. Intra-group guarantees	2
D	Securitisation of assets (e.g. UK securitisation company regime)	1
E	Tax representations in ISDA Master Agreement	2
F	Cross-border tax considerations when functions are moved between branches/entities within a banking group	2

IV Transaction taxes and withholding taxes

A	Proposed European Financial Transaction Tax; extra-territorial impact of Italian Financial Transaction Tax and French Financial Transaction Tax	3
B	Application of Stamp Duty and SDRT to on and off-exchange securities transactions in London and Hong Kong markets	2
C	Withholding Tax on distributions and capital gains for fixed income, cash equities, listed and OTC derivatives, ETNs & ETFs, cash and non-cash collateral, repo and Reverse-repo, stock lending and borrowing	3
D	US Chapter 3 Withholding on Non-Resident Aliens including IRS Qualified Intermediary Agreement and Qualified Derivative Dealer regime	3
E	VAT/GST, including partial exemption	2
F	Cryptocurrency, initial coin offering, asset tokenisation and the secondary market	2

V Bank levy

A	UK bank levy	2
B	Overview of bank levies in other significant territories (France, Germany, South Korea)	2

VI Client tax reporting

A	FATCA; Common Reporting Standard (CRS); Directive Administrative Co-operation – 2011/16/EU (DAC2 – 2014/107/EU)	3
B.	UK Corporate Criminal Offences for failing to prevent criminal facilitation of tax evasion (Criminal Finances Act 2017, Part 3); Mandatory Disclosure Regime – 2011/16/EU (DAC6 – 2018/822/EU); OECD, Model Mandatory Disclosure Rules for CRS Avoidance and Opaque Offshore Structures	3

VII The OECD context

A	The OECD's Base Erosion and Profit Shifting (BEPS) Project	1
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RECOMMENDED READING LIST

Permitted Texts

Candidates may take a copy of the following texts only into the examination:

OECD. *Additional Guidance on the Attribution of Profits to Permanent Establishments. BEPS Action 7* (Paris: OECD, 2018)

Available from the OECD: www.oecd.org

OECD, Committee on Fiscal Affairs. *Model Tax Convention on Income and on Capital: Condensed Version 2017* (Paris: OECD, 2017)

Available from the OECD: www.oecd-ilibrary.org

OECD, Committee on Fiscal Affairs. *Report on the Attribution of Profits to Permanent Establishments* (Paris: OECD, 2010)

Available from the OECD: www.oecd-ilibrary.org

All available in the following publication:

Van Raad, K. *Materials on International, TP and EU Tax Law 2020-2021*. Volume A (Leiden: International Tax Centre, 2020) [ISBN: 9789082585452]

Available from the International Tax Centre at Leiden University:

www.itc-leiden.nl or b.bosman@itc-leiden.nl

Or available from Wildy & Sons: www.wildy.com

No other texts may be taken into the examination.

Essential Reading

Association Francaise des Marches Financiers. *French Financial Transaction Tax FTT Guidelines* (AMAFI, 2017)

Available from AMAFI:

www.amafi.fr

Australian Tax Office. *Voluntary Tax Transparency Code* (ATO, 2016)

Available from the Australian Tax Office:

www.ato.gov.au/Business/Large-business/In-detail/Tax-transparency/Voluntary-Tax-Transparency-Code

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EXTENDED ESSAY OPTION RULES

ADIT candidates may submit a 15,000-20,000 word extended essay, instead of sitting either a Module 2 or Module 3 exam.

1. Candidates must first submit a proposal using the extended essay proposal form, available at www.tax.org.uk/adit/extended-essay. The proposal must include:
 - a working title; and
 - a brief synopsis of your topic, approximately 250 words in length and outlining the scope and planned objectives of your proposed extended essay.
2. Approval of the extended essay proposal is at the sole discretion of the ADIT Academic Board.
3. The proposal must be accompanied by a registration fee, currently £200, which will be collected only if the proposal is approved. ADIT fees are subject to annual review and may change over time.
4. Registration is valid for three years from the date of notification of approval by the Academic Board. Subject to the approval of the Academic Board, an extended essay proposal may be changed within the three-year period without a further fee being charged. However, candidates are recommended to submit their extended essay within two years of approval in order to maintain the momentum of attaining the qualification.
5. If the candidate has chosen to submit an extended essay instead of sitting a Module 2 examination, the subject matter of the extended essay must be related to international tax from the perspective of a particular tax jurisdiction. Extended essays dealing with matters of international or supranational tax policy are acceptable, so long as the effects on and/or relationship with the chosen jurisdiction are included. Likewise, extended essays which carry out comparative studies of the chosen jurisdiction with those of other jurisdictions are acceptable.
6. If the candidate has chosen to submit an extended essay instead of sitting a Module 3 examination, the subject matter of the extended essay must be related to some aspect of international tax as it affects a specific sector, area of taxation or transnational grouping or supranational entity such as the World Trade Organisation or the European Union.
7. The tax jurisdiction or subject area covered by the extended essay must differ from that of the Module 2 or Module 3 exam selected by the candidate for the remaining option module. For example, if you plan to sit the Module 3.03 Transfer Pricing exam, your extended essay should cover a subject area other than transfer pricing, and if you plan to sit the Module 2.10 United States exam, your extended essay should cover a jurisdiction other than the United States. If you plan to sit a Module 2 exam and complete a comparative study in your extended essay, then your extended essay may include the jurisdiction addressed by your Module 2 exam but will also need to focus on at least one other jurisdiction.
8. Further guidance regarding the subject matter of the extended essay is given in the Extended Essay Guidance Notes on the following pages. Where appropriate (e.g. in an extended essay which takes an aspect of a tax system as its subject and which draws on the author's practical experience), adequate consideration should be given to the commercial and legal background to the topic so that such matters as company law, trust law, contract law and generally accepted accounting principles are discussed where relevant.
9. The extended essay must be personal to the candidate. This means that it must contain the candidate's original analysis of the issues under consideration.
10. The extended essay must be fully referenced. This means that all books, articles and other sources (including in-house technical materials) used must be cited in the text by way of footnote. Where quotations are used, these should be clearly identified as such and properly referenced. A full bibliography should be provided.

11. The extended essay should normally be between 15,000 and 20,000 words and must be submitted in English.
12. The extended essay should be presented in accordance with the instructions in the Extended Essay Guidance Notes regarding page layout, margins and spacing. The candidate's extended essay reference number should be clearly marked on the outer cover, but there should be no mention of the candidate's name or ADIT student number either on the cover or elsewhere in the work.
13. One electronic softcopy must be submitted to the CIOT. The essay must be accompanied by a completed Extended Essay Declaration Form, confirming that the extended essay has been completed in accordance with the Extended Essay Rules, and that the extended essay is the candidate's own work.
14. Extended essays will be reviewed as quickly as possible, normally within four months, but the Academic Board reserves the right to take such time as may be needed to complete its review.
15. In cases of failure to reach the required standard, the Academic Board will provide a short report to the candidate outlining the principal areas of deficiency. The report will indicate whether a revised submission making good the deficiencies identified will be permitted. The decision of the Academic Board is final.
16. By submitting an extended essay to the Academic Board, candidates grant the CIOT a non-exclusive, royalty free licence to publish it in whole or in part in Tax Adviser (the CIOT's monthly and online journal), on the CIOT website, and/or otherwise, if the extended essay is approved. The CIOT also reserves the right to make available any extended essay which has been approved for reading or photocopying. Any application for the CIOT to waive these rights must be made at the time of submission and will be judged on its own merits, with the decision of the CIOT being final. Copyright will remain vested in the authoring candidate.
17. The John Avery Jones Extended Essay Prize may, at the discretion of the Academic Board, be awarded to the candidate who, in the sole opinion of the Academic Board, achieves the highest standard in any calendar year.
18. The Academic Board reserves the right to amend the rules regarding extended essays at any time, but the rules applying at the date of the application for extended essay approval will remain valid throughout the period of registration.
19. Any candidate submitting an ADIT extended essay must hold a valid ADIT student registration at the time of submission.
20. ADIT extended essay passes are valid for five years from the date on which the pass is awarded.

EXTENDED ESSAY OPTION GUIDANCE NOTES

Introduction

These guidance notes are intended to clarify the requirements for the presentation of your ADIT extended essay, which are laid down in the Extended Essay Rules. They aim to indicate those matters for which extended essay reviewers will be searching, to summarise the main faults commonly found in extended essays, and to list the steps in approaching the preparation of an extended essay which the ADIT Academic Board considers will increase the likelihood of your success.

Choosing a topic

The primary questions to address are:

“What aspect of international taxation really interests me, and does it provide sufficient scope for a 15,000-20,000 word extended essay?”

Extended essays may address an area of taxation in which you have considerable practical experience, be based purely on academic research or be a mixture of the two.

Originality

A key requirement for success is that your extended essay contains a high degree of originality. The nature of originality means that it is impossible to specify what constitutes it but, by way of illustration, originality may be achieved in one or more of the following ways:

- By drawing on your own professional experience;
- By drawing together for the first time diverse sources of information on a particular topic, to present a coherent and novel treatment of the subject; and
- By relating an aspect of taxation to wider legal, political, economic or ethical considerations in a way that has not previously been done.

The key test that will be applied is whether or not the extended essay treats the chosen topic in a way not previously published.

There is no bar to choosing topics on which ADIT extended essays have previously been submitted, provided the foregoing guidelines are following.

The required extended essay standard

The extended essay should be of publishable quality, i.e. broadly equivalent to a dissertation for a master's degree at a UK university.

Plagiarism and academic bad practice

As an ADIT extended essay candidate, you are expected and required to adhere to a high standard of academic practice. The CIOT takes offences such as plagiarism very seriously and, if judged to have engaged in academic bad practice in the conduct of your extended essay, you may, in addition to receiving an automatic fail grade for the ADIT extended essay, be subject to penalties including disqualification from the ADIT extended essay option and/or ADIT and related CIOT examinations.

While a distinction will always be made between accidental instances of misattribution (such as resulting from a typing error or use of an unrecognised citing convention in a footnote), and deliberate attempts to pass someone else's work off as your own, you are strongly advised to double check that all uses of external sources are properly and correctly referenced, with the author and text indicated in the footnotes and bibliography.

The CIOT reserves the right to use plagiarism checking software to screen extended essays for unattributed or improperly attributed use of the work of others. By submitting an extended essay, you consent to the submission of the text to plagiarism checking software. Processing by such software may involve inclusion of the text in the software's database. This does not affect ownership of or copyright in the extended essay, which remains with the author.

Examples of external sources which need to be referenced include:

- Direct quotations;
- Arguments or conclusions from other authors which you have summarised or paraphrased;
- Extracts from external sources which you have reproduced or adapted anywhere in the extended essay (in appendices as well as the main body of the work);
- Images or graphical depictions which you have reproduced or adapted anywhere in the extended essay (in appendices as well as the main body of the work);
- Ideas which you have previously presented in an earlier work (however, this does not include an earlier submission of the same extended essay, if the submission was in fulfilment of a university assessment or other academic requirement); and
- Any external source which is in a language other than English. Many essays on international tax topics will use foreign language primary and secondary source materials, and indeed your ability to review and analyse foreign language materials may be a major advantage in researching a topic. However, the usual research and citation standards apply. In particular, all citations to foreign language materials should include full citation information in both English and the original language.

As a general rule of thumb, if you have depicted or referred to an idea, conclusion, quote or piece of data which is not original to your extended essay, even if it is your own idea, conclusion, quote or piece of data from another work, it should be referenced.

The Academic Board reserves the right to request copies of any cited material which it cannot easily obtain.

The importance of analytical content

It necessarily follows from the requirement for originality that a successful ADIT extended essay will contain a high degree of analytical content. This must be distinguished from descriptive content. Whilst some descriptive content will be necessary, for example to explain the current or previous legal position or practice, the analytical content should provide, inter alia, commentary on (and critique of) the current or previous legal position or practice, together with your own opinions (and recommendations, if appropriate). Extended essays consisting mainly of descriptive content are less likely to succeed than ones with a high degree of analytical content. However, the analytical content must not be achieved at the expense of thorough research into your subject matter.

Breadth versus depth

The requirement for a high degree of analytical content means that your extended essay is more likely to succeed if it covers a narrow area in depth, rather than a broad area superficially. In other words, you are advised to limit

the scope of your extended essay to a few specific sections of tax law. For instance, if you wish to write on taxation in eastern European countries, you are advised to limit your extended essay either to one particular country or tax, or both (e.g. VAT in Romania) or even to a particular aspect of a tax (e.g. VAT on e-commerce in eastern European countries).

Your extended essay should involve a comprehensive treatment of your topic, meaning that all relevant aspects need to be analysed, unless the extended essay topic has been carefully defined to exclude them. Where appropriate, consideration of the relevant aspects of other areas of law or of accountancy should be included.

Technical accuracy

The Academic Board realises that some extended essays will be written about contentious areas or provisions. The Academic Board believes that there should always be room for a divergence of views as to the interpretation of statutes and case law,, and it wishes to encourage discussion of the meaning of the law. You should therefore not hesitate to discuss contentious points, but you will be expected to support any position you may take. Provided your position is well reasoned, you will not be penalised if the reviewer happens to hold an opposing view.

Extended essays on tax planning issues

If your extended essay takes as its topic international issues in tax planning then it is important that the commercial aspects of the planning points and practical considerations in their implementation are considered. Relevant examples and illustrations would be expected, together with due consideration of the legal and, where relevant, accounting considerations of the planning strategies being put forward.

Changes in the law during preparation of the extended essay

Your extended essay should state at the outset the date through which the relevant law is covered. In general, if your extended essay deals with specific points of law that have changed since notification of approval of your extended essay proposal, then the following guidelines apply:

- Changes should generally be fully dealt with in the body of the extended essay unless they are announced less than three months prior to submission.
- Changes announced more than three months but less than one year before the submission date may either be fully dealt with throughout the extended essay or acknowledged via the addition of a short chapter discussing the impact of the changes on the subject matter of the extended essay.

Steps in researching and writing the extended essay

A good extended essay poses an interesting, focussed question and provides a reasoned answer to that question or identifies a problem and proposes a solution to that problem.

Keeping in mind that researching and writing a law essay is a dialectical process, not a linear one, these are the basic steps:

1. Choose a topic of interest both to yourself and potential readers. Know your target audience.
2. Narrow the scope of the topic down to a discrete issue that can be dealt with well in 15,000-20,000 words. You should avoid being too broad and descriptive while at the same time avoid being so narrowly focussed as to be unlikely to interest potential readers.

3. Know and cite the existing literature relevant to your issue.
4. Make sure the structure of the extended essay follows the logic of the argument, and maintains the focus of that argument throughout the essay.
5. Include your analysis and, where relevant, recommendations.

Collecting source materials

An ADIT extended essay is intended to be a work of scholarship and will require painstaking research into your chosen area, encompassing some or all of legislation, case law, books, journal articles, professional publications, websites, professional correspondence and files, and unpublished work such as university theses or dissertations, and other ADIT extended essays. In any extended essay which addresses a more academic topic, it will usually be appropriate to include a formal literature review so that the reader is aware of the volume and nature of materials available which are relevant to the topic.

You may find that noting the specific source of an idea, argument or quotation when taking notes will save you considerable time when writing up your essay.

Planning the structure of the extended essay

Whatever the topic of your extended essay you should write down, and keep in mind, the primary objective of your extended essay. Perhaps there is a question on which you wish to reach a conclusion. Perhaps you are seeking to perform a comparative study of an aspect of the tax system. Perhaps there is an assertion which you wish to try and prove. Making a list of criteria to be used in answering the question, making the comparison or proving the assertion will greatly assist in providing the extended essay with a logical and rational structure. For instance, if making a comparative study between property taxes in two jurisdictions, what will be the points of comparison for the analysis? Fairness? Simplicity? Effect on the housing market? Effect on business expansion?

Having done this, you should be in a position to outline your extended essay with chapter headings and approximate word allocations, taking care to allocate sufficient time and space to descriptive and analytical material and discussion. You should remember that it may be more appropriate to locate larger tracts of descriptive material in appendices if they are relevant to the extended essay but do not contribute directly to the analysis.

Writing up

You may find it difficult to begin writing your extended essay. However, rest assured that, once started, candidates often find it even more difficult to finish! This is a personal choice, but you may find it easier to start with descriptive sections or by preparing practical or numerical examples rather than plunging straight into analysis.

You are strongly advised to discuss your extended essay with colleagues or other contacts with appropriate knowledge of the subject matter, to have one or more of them read and critically review it and to arrange for a colleague or contact to proofread your extended essay prior to submission.

Conclusions

A successful ADIT extended essay will contain well-argued conclusions which are supported by preceding analysis and descriptive materials. The conclusions should form a substantial part of the extended essay, rather than being confined to a few sentences at the end.

Presentation

The title of your extended essay and the extended essay reference number, assigned on approval of the extended essay, must be on the front cover. Your name and ADIT student number should not appear anywhere on the extended essay, and you should ensure that you have deleted any personal information associated with the file.

The extended essay must be typed using Times Roman, Arial, Calibri or similar easily readable typeface, in 12 point font size.

The text should be double spaced. Page margins should be as follows:

- Left (binding edge): 40 mm
- Other margins: 25 mm

Page numbering and table of contents

Pages must be numbered in a single sequence throughout your extended essay. Page numbers should be located within the page footer, at least 15 mm from the edge of the page.

A table of contents should appear at the front of the extended essay, immediately following the title page. It should list, in sequence and with page numbers, all chapters, sections and relevant subsections of the extended essay; the bibliography; and any additional items included, such as appendices and any list of abbreviations.

Acknowledgements

Any acknowledgements should be given on the page immediately following the table of contents.

Referencing

A recognised referencing system should be used. In keeping with generally accepted practice in legal writing, this should be a full footnote citation system such as the Oxford Standard for the Citation of Legal Authorities (OSCOLA). Guides to and examples of OSCOLA and other full footnote citation systems are widely available, online and in print. Suitable modifications may be made for foreign language material and other material not sufficiently addressed by the citation system, as long as any such citations are consistent with the citation system.

In the context of the ADIT extended essay, the purpose of citation is two-fold: to acknowledge the source of an idea, an argument a quotation or other material and to make it easy for the reader to check the source, either for accuracy or to read further. For these reasons, regardless of the referencing system used, a number of pieces of information should be included in each reference, to ensure that the reference can be traced and avoid the possibility of accidental misattribution or academic bad practice.

When citing a book, you should include:

- the full name(s) of the author(s);
- the title and edition of the work;
- the publisher and year of publication; and
- the page(s) from which the information is drawn.

When citing a journal, you should include:

- the full name(s) of the author(s);
- the title of the article;
- the title, publication year, volume and issue number of the journal; and
- the page(s) from which the information is drawn.

When citing a legal case, piece of legislation or report, you should include:

- the full title (including the parties' names in the case of legal cases);
- the year of judgment, effective date and/or publication date;
- the volume, law or report number (if there is one);
- the judge or author, where relevant; and
- the page(s) or section(s) from which the information is drawn.

When citing a webpage, you should include:

- the name of the authoring individual(s) or organisation;
- the title of the website and article;
- the full web address (URL); and
- the date on which the information was published (if available) and the date on which the webpage was viewed.

Bibliography

ADIT extended essays should contain a full bibliography. Your bibliography should list references in alphabetical order by authors' last names. Where more than one publication by the same author has been used, the publications should be listed in chronological order with the oldest item first. The bibliography may be divided into sections (e.g. books, journal articles, websites, etc).

Submitting your essay

As detailed in the Rules (Rule 13), you must submit one electronic softcopy of your extended essay. The essay should be sent to education@adit.org in either MS Word (.doc or .docx) or PDF format.

Your essay must be accompanied by a completed Extended Essay Declaration Form, confirming that your essay has been completed in accordance with the Extended Essay Rules, and that all sections of your essay are your own work.

Find out more at
www.tax.org.uk/adit/extended-essay

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