

**NOVEMBER 2025**

**APPLICATION AND PROFESSIONAL SKILLS – TAXATION OF LARGER COMPANIES AND GROUPS**

**ASSESSMENT NARRATIVE**

Structure

A simple pass or fail will be awarded.

Identification and Application

The following are the relevant topics for assessment with their weightings:

1	25%	Transfer pricing (including options to reduce uncertainty) under each possible business model (licensing and integrated)
2	20%	DTT and MTT: effect of business model choice on domestic tax position in UK and Zevmark
3	30%	RDEC and Patent Box for product development in the UK
4	25%	Other tax issues (WHT, DPT, CFC, VAT, reporting)

A grade of 0,1,2,3, or 4 is awarded for each topic. The weighting is applied to that grade to produce a weighted average grade. This is then converted to a final absolute grade by rounding up or down to the nearest grade. Thus, scores in the range 2.5 to 3.49 will be a grade 3.

Relevant Advice and Substantiated Recommendations

The following are the topics for assessment with their weightings:

1	40%	Tax and other implications of the choice of business model
2	40%	Tax and other implications of the choice of location
3	20%	Wider issues

The final grade will be determined for this skill in the same way as for Identification and Application.