

**ASSESSMENT NARRATIVE FOR APS TOLC
November 2021**

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%	Identify the sale proceeds of each of the four possible options (subject to SDLT saving).
2	45%	Corporation Tax and capital allowances implications of each transaction method.
3	15%	VAT implications of each transaction method.
4	15%	Stamp duties implications of each transaction method.

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	50%	Rate the four options 1-4 on the basis of their after-tax proceeds and conclude that Option 1 is the most tax effective while Options 2, 3 and 4 give rise to much higher tax liabilities.
2	30%	Rate the four options 1-4 on the basis of their ability to achieve the stated business objectives and reach a reasonable conclusion.
3	20%	In the light of Option 1 risks, conclude that Option 1 should be pursued only if a quick sale of all properties can be achieved, and if not that one or more other options should be pursued.

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