

ASSESSMENT NARRATIVE – TAXATION OF LARGER COMPANIES AND GROUPS

Structure

A simple pass or fail will be awarded.

Identification and Application

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

1	15%	Taxation of royalty income, payments, and losses, including the patent box regime
2	30%	Research and Development tax relief
3	10%	Transfer pricing considerations
4	25%	Exit strategy under joint venture option, including calculations
5	20%	Exit strategy under Newco option, including stamp duty considerations

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%	Most appropriate structure in the four years from the start of the project
2	50%	Most appropriate structure in respect of the exit strategy

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