

ASSESSMENT NARRATIVE – APS LARGER COMPANIES AND GROUPS MAY 2023

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%	Availability of losses and capital allowances in the UK.
2	15%	Disallowances under the UK Corporate Interest Restriction (CIR) rules.
3	25%	How to bring trading profits into the UK tax regime.
4	20%	Projected group tax liabilities of different scenarios.
5	15%	Impact of grant availability in Benignland.

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%	Which trades to move to UK.
2	40%	Whether to move residences of existing companies or transfer trades to other (including new) companies.
3	20%	Advice on if, and when, to move the Benignland trade.

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