RPC

Corporate tax update

Third quarter 2016

Welcome to the latest edition of our Corporate Tax Update, written by members of RPC's tax team and published quarterly. Summer 2016 will certainly go down as one of the more interesting in recent British history but developments in UK tax law continue regardless of the wider political turmoil. In this edition we highlight some of the key tax developments of interest to UK corporates from the third quarter of 2016. As far as the tax legislative timetable is concerned, in this quarter: the Finance Bill 2016 finally received Royal Assent on 15 September 2016 (known as Finance Act 2016); it was announced that this year's Autumn Statement will be given on 23 November 2016; it was also announced that draft Finance Bill 2017 clauses will be published on 5 December 2016 (for consultation until 30 January 2017).

Corporation tax – general

Northern Ireland corporation tax regime – draft guidance published

On 29 September 2016, HMRC published draft guidance on the planned new Northern Irish corporation tax regime. more›

Digital disclosure service launched by HMRC

On 5 September 2016, HMRC launched its digital disclosure service. more›

VAT

Retrospective VAT group treatment – HMRC publishes revised guidance

On 21 and 22 September 2016, HMRC published updated guidance on retrospective VAT group treatment. more›

Pension fund management costs – extension of transitional period

On 5 September 2016, HMRC announced a further 12-month extension (to 31 December 2017) of the transitional period in which employers can recover 30% of the VAT due on single invoices covering both administration and investment management services. more›

Financial services intermediary exemption – First-tier Tribunal focuses on the substance of the supply in question

On 19 August 2016, the First-tier Tribunal (in *Dollar Financial UK Ltd v HMRC*[1]) held that electronically-supplied services of a "lead generator", whereby the supplier referred potential borrowers to a payday lender, were exempt for VAT purposes under the financial services intermediary exemption (Item 5 of Group 5 to Schedule 9, VATA 1994). more›

Any comments or queries?

David Gubbay
Partner
+44 20 3060 6050
david.gubbay@rpc.co.uk

Ben Roberts
Senior Associate
+44 20 3060 6184
ben.roberts@rpc.co.uk

VAT representative member treated as making timely claim for repayment of overpaid VAT

On 14 July 2016, in *Taylor Clark Leisure plc v HMRC*[2], the Scottish Court of Session held that claims made by a former member of a VAT group under section 80 VATA 1994 (overpaid VAT) were treated as made by the representative member of the VAT group. more›

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Taxation of termination payments – consultation response and draft legislation

On 10 August 2016, HMRC published responses to its July 2015 consultation on the tax and national insurance contributions (NICs) treatment of termination payments. more›

Salary sacrifice arrangements – consultation launched

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Recovery of PAYE and NICs from directors – two Tribunal decisions

Different decisions have been reached by two differently constituted First-tier Tribunals when faced with a largely similar set of facts. more›

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SDLT filing and payment consultation

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Partnership taxation – HMRC consultation on further changes

On 9 August 2016, HMRC published a consultation document proposing a number of changes to the taxation of partnerships. more›

HMRC publishes interim guidance – in the form of a clearance application response – on the new "phoenixism" TAAR

On 1 August 2016, HMRC published a "standard" response to non-statutory clearance applications regarding the new targeted anti-avoidance rule (TAAR) introduced by the Finance Act 2016 designed to prevent "phoenixism". more›

Look-through taxation for "small" companies – responses sought

On 18 July 2016, the Office of Tax Simplification (OTS) published a discussion document on proposals to "look through" certain "small" companies for tax purposes. more›

International

European Commission decides Irish tax rules amounted to illegal state aid for Apple

On 30 August 2016, the European Commission (EC) announced its decision that Ireland had provided illegal state aid to Apple amounting to EUR 13bn, plus interest. more›

BEPS project: hybrid tax mismatch rules – OECD's views on branches

On 22 August 2016, the Organisation for Economic Co-operation and Development (OECD) published a discussion document on proposed branch mismatch rules, as part of its ongoing work on the base erosion and profit shifting (BEPS) project Action 2 (hybrid mismatches). more>

BEPS project: interest deductibility in banking and insurance industries – OECD's proposed approach

On 28 July 2016, the Organisation for Economic Co-operation and Development (OECD) published a discussion paper on its proposed approach to interest deductibility in the banking and insurance sectors. more>

BEPS project: interest deductibility – OECD discussion paper on group ratio rule

On 11 July 2016, the Organisation for Economic Co-operation and Development (OECD) published a discussion document on the group ratio rule that forms part of its proposals on interest deductibility (Action 4 of the OECD's base erosion and profit shifting (BEPS)). more>

Corporation tax – general

Northern Ireland corporation tax regime – draft guidance published

On 26 September 2016, HMRC published draft guidance on the planned new Northern Irish corporation tax regime. The headline grabbing aspect of the planned new regime is for a 12.5% rate of corporation tax to apply to certain trading income from April 2018.

Although the Corporation Tax (Northern Ireland) Act 2015 was enacted in March of this year, it will not take effect until the Northern Ireland Executive is able to demonstrate that its finances are on a "sustainable footing".

The draft guidance can be viewed here.

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Digital disclosure service launched by HMRC

On 5 September 2016, HMRC launched its digital disclosure service. This allows taxpayers to make voluntary disclosures of underpaid corporation tax (and NICs) provided HMRC has not opened an enquiry into the relevant return.

Although the new disclosure facility is not specifically designed to offer the disclosing taxpayer more favourable terms, the general tax rules that see lesser penalties imposed on taxpayers making full and unprompted disclosure will apply to disclosures made through this new service.

Under the new service, once HMRC have acknowledged the initial taxpayer notification the taxpayer will have 90 days to make the disclosure and pay the tax (or put in place an arrangement to pay the tax).

The disclosure service can be accessed here.

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VAT

Retrospective VAT group treatment – HMRC publishes revised guidance

On 21 and 22 September 2016, HMRC published updated guidance on retrospective VAT group treatment.

The Tribunals have previously criticised HMRC's approach to retrospective group applications (for example, see here for our commentary on the decision in *Copthorn Holdings Ltd v HMRC*).

The updated guidance is unchanged as regards HMRC's approach in "ordinary" cases, but does give some further examples of "exceptional" cases and states that HMRC will not automatically reject "exceptional" cases that do not fall within these limited examples.

The revised guidance can be viewed here.

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Pension fund management costs – extension of transitional period

On 5 September 2016, HMRC announced a further 12-month extension (to 31 December 2017) of the transitional period in which employers can recover 30% of the VAT due on single invoices covering both administration and investment management services.

This transitional period treatment allows employers to continue to adopt the approach accepted by HMRC in respect of such costs prior to the ECJ decision in 2014 in *PPG* (for a discussion, see here).

Following this announcement, on 14 September 2016, HMRC republished Brief 17 (2015) originally issued in October 2015.

The HMRC announcement can be viewed here.

The updated Brief can be viewed here.

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Financial services intermediary exemption – First-tier Tribunal focuses on the substance of the supply in question

On 19 August 2016, the First-tier Tribunal (in *Dollar Financial UK Ltd v HMRC*[1]) held that electronically-supplied services of a "lead generator", whereby the supplier referred potential borrowers to a payday lender, were exempt for VAT purposes under the financial services intermediary exemption (Item 5 of Group 5 to Schedule 9, VATA 1994).

The lead generator "assessed" potential borrowers who came to its website before passing his or her details on to one of its customers (including the appellant in this case). The lead generator decided which customer to (first) put in contact with the borrower by identifying those customers for whom the borrower satisfied the loan criteria and was not seeking an amount that exceeded that customer's maximum loan amount. Of the shortlisted customers, the lead generator (first) chose that customer offering the highest referral fee. If the customer refused the referral, the lead generator would move the next customer from the shortlist, and

1. [2016] UKFTT 0598 (TC).

so on. All this happened in a matter of seconds, electronically. The appellant paid commission to the lead generator if it purchased a lead (meaning that the introduction resulted in a loan offer being made to the borrower).

Very few borrowers arriving at the lead generator's website would, ultimately, take out a loan with the appellant, because:

- the lead generator had a number of customers, with differing loan criteria and loan limits
- another customer might "outbid" the appellant for the lead by offering a greater commission
- only about 1% of the leads offered to the appellant would be offered a loan. The main cause of rejection was due to the lead already being known to the appellant
- a little over half of the borrowers offered a loan by the appellant would accept it.

The Tribunal drew some principles from decided cases involving insurance intermediaries, due to the similarity between the statutory exemptions for supplies by insurance and financial services intermediaries. It was also accepted that supplies made purely by electronic means can qualify for exemption, and that a novel arrangement was no barrier to exemption. Rather, the focus should be on the substance of the supply, and not who makes it and how.

The Tribunal was not persuaded by HMRC's arguments that the lead generator acted only as a mere conduit, failing to properly "assess" the borrowers. Although the appellant's loan criteria were straightforward, they were not identical to those of every other lender. Some filtering therefore did, in the Tribunal's eyes, take place. The lead generator therefore fell the right side of the line between mere conduit/advertiser on the one hand, and "introducer" on the other.

The decision can be viewed here.

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VAT representative member treated as making timely claim for repayment of overpaid VAT

On 14 July 2016, in *Taylor Clark Leisure plc v HMRC*[2], the Scottish Court of Session held that claims made by a former member of a VAT group under section 80 VATA 1994 (overpaid VAT) were treated as made by the representative member of the VAT group.

The appellant in this case was the VAT group representative member. The group made supplies of gaming machines and bingo. A one-time member of the VAT group (C) left the group and subsequently, following a review of the UK's historic treatment of the VAT liability of supplies of gaming machines and bingo, made a number of claims for repayment of overpaid VAT. Although C made these claims within applicable time limits, the appellant (the representative member) failed to do so.

HMRC made certain repayments direct to the appellant (where C had made the claims in the appellant's name), before changing its mind and seeking recovery of the repayments. HMRC refused to make other repayments. The appellant appealed HMRC's attempts to recover and refusals to pay.

The Court held that C's claims should for section 80 VATA purposes be treated as having been made on behalf of the appellant as representative member. The Court considered that the VAT grouping rules created the "fiction" of a single taxable person, existing only for VAT purposes.

2. [2016] CSIH 54.

All liabilities of HMRC to make repayments were, in the Court's view, owed to the representative member. The individual group members had no independent existence, for the purposes of VAT. This remained the case even after the individual group member (C) had left the group, and the group as it was had ceased to exist. Adopting this reasoning the Court held that the claims by C had to be construed as having been made by (or rather on behalf of) the appellant.

As HMRC highlighted a number of practical issues that, under HMRC's argument, supported their case, these were addressed by the Court briefly as follows:

- HMRC should be required to inform any former VAT group member making a section 80 claim that their claim would be considered by HMRC as being made on behalf of the representative member
- the representative member could, if it wished, "override" any purported section 80 claim made by a former VAT group member (for example if the representative member wished to maintain the VAT group's partial exemption calculation)
- if a section 80 claim made by a former VAT group member is rejected, HMRC should inform the representative member of that fact.

The law with regards to claims for VAT repayments in the context of VAT groups remains uncertain. This decision reflects the general trend of recent decisions (that it is the representative member who is responsible for/entitled to VAT (re)payments) but will be persuasive only as far as other, ongoing, cases are concerned. It would be helpful if HMRC were to comment on this issue as part of the current consultation into VAT groups following the *Skandia* and *Larentia + Minerva* decisions. Pending any such clarification, the best practical advice for VAT groups making repayment claims would be for the representative member to take control of the process (even, if at all possible, in cases where the group member concerned has since left the VAT group).

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Employment taxes

Taxation of termination payments – consultation response and draft legislation

On 10 August 2016, HMRC published responses to its July 2015 consultation on the tax and national insurance contributions (NICs) treatment of termination payments. The response document included draft legislation to enact the proposed changes.

The objectives behind the original consultation included the desire to simplify and increase the certainty of the rules in this area.

From April 2018:

- the distinction between contractual and non-contractual payments in lieu of notice (PILONS) will be removed; all PILONS will therefore be subject to tax and NICs
- the £30,000 tax and NICs exemption for "genuine" termination payments (ie those payments related to termination and not taxed under any other provision of the taxable earnings legislation) will be retained
- departing employees will continue to benefit from an unlimited employee NICs exemption on "genuine" termination payments
- employers' NICs will be payable on payments over £30,000
- the tax exemption for payments for injury will exclude injury to feelings (unless in relation to psychiatric injury or another recognised medical condition)
- foreign service relief will be (largely) abolished.

An original proposal to introduce a variable tax exemption (rather than a standard £30,000 threshold) based on the departing employee's length of service has happily been dropped, presumably as the government has been persuaded that such a move would do nothing for the ambition of simplifying the rules.

The consultation response can be viewed here.

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Salary sacrifice arrangements – consultation launched

On 10 August 2016, HMRC published a consultation document on the restriction of salary sacrifice arrangements, as announced at this year's Budget. The stated intention is to reduce the range of benefits in kind that attract favourable income tax and national insurance contributions (NICs) treatment when provided by way of salary sacrifice.

As expected, the following benefits will not be affected:

- employer pension contributions
- employer-provided pension advice
- employer-supported childcare
- provision of workplace nurseries
- cycles and safety equipment provided under the cycle to work scheme.

The consultation document confirms that the government wants to "level the playing field" (as not all employers/employees offer/are offered such arrangements) but also to reduce the increasing cost to the Exchequer of these types of arrangements.

The proposal is that, save for the benefits listed above, a benefit in kind will be subject to income tax and NICs when provided by way of salary sacrifice **even if it would normally be exempt from tax and NICs**. The charge would be on the greater of the amount of salary sacrificed and the normal taxable value of the benefit. It is intended that the changes will take effect from April 2017.

The consultation can be viewed here.

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Recovery of PAYE and NICs from directors – two Tribunal decisions

Different decisions have been reached by two differently constituted First-tier Tribunals when faced with a largely similar set of facts. In each case the issue was whether HMRC could recover PAYE and national insurance contributions (NICs) liabilities on salaries paid to the directors of close companies.

In each case the directors paid themselves large salaries but the company did not account to HMRC for the PAYE and NICs arising on those salaries. HMRC then sought to transfer the liability for the unpaid PAYE and NICs to the directors, but the directors argued in each case that the employer company had not **wilfully** failed to pay the tax and NICs (rather it was unable to do so due to it being in financial difficulties). As it is a statutory requirement, for the liability to be transferred from employer to employee, that the employee received the payment knowing the employer had wilfully failed to deduct PAYE and/or NICs, the directors argued that the liability could not so transfer.

On 3 August 2016, the Tribunal held in *West v HMRC*[3] (by prevailing decision of the tribunal judge as the two members could not agree) that as the PAYE and NICs liabilities had been put through the company's balance sheet as amounts due to HMRC this counted as a deduction for the purposes of the relevant legislation. The fact that a book entry for the liabilities had been made, which the employer company was in fact unable to pay, meant that the company had not wilfully failed to make the deduction. The taxpayer's appeal was therefore allowed.

On 2 August 2016, in *Marsh & Another v HMRC*[4] it was held that the PAYE and NICs had not been deducted. In this decision, it was held that the book entry (in the monthly payroll) did not show an amount had been "deducted".

It is difficult to reconcile these two decisions, and it seems likely that HMRC will appeal the decision in *West*.

To view the decisions click here and here.

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3. [2016] UKFTT 0536 (TC).
4. [2016] UKFTT 0539 (TC).

Stamp taxes

SDLT filing and payment consultation

On 10 August 2016, HMRC launched a consultation on changes to the stamp duty land tax (SDLT) payment and return filing process.

It had already been announced in Autumn Statement 2015, that the SDLT payment window would be reduced from 30 days to 14 days with effect between 2017-2018. It is now considered "likely" that this reduction in the payment window will take effect between January-March 2018. This consultation proposes further changes, intended to "increase efficiency, and reduce the compliance burden and costs" including:

- making online filing of SDLT returns, and electronic payment of SDLT, mandatory for agents
- allowing SDLT returns to be amended online within 12 months of submission.

The consultation can be viewed here.

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Other developments

Partnership taxation – HMRC consultation on further changes

On 9 August 2016, HMRC published a consultation document proposing a number of changes to the taxation of partnerships. This follows on from the Office of Tax Simplification's ongoing work on ways to simplify partnership taxation. Comments on the proposals are invited by 1 November 2016.

The proposals include:

- treating partners in partnerships which are themselves partners in an underlying partnership as partners in that partnership (recognition of tiered partnership structures). A nominated partner in the underlying partnership would be required to provide details of all partners (including those partners which, as a result of this proposal, are treated as partners in the underlying partnership) and their share of the profits and losses of the underlying partnership.
- treating all persons listed as partners in the partnership tax return as partners for tax returns. HMRC does not believe that partners who claim to be acting as nominee or agent for someone else can escape taxation as a partner in this way.

The consultation document can be viewed here.

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HMRC publishes interim guidance – in the form of a clearance application response – on the new "phoenixism" TAAR

On 1 August 2016, HMRC published a "standard" response to non-statutory clearance applications regarding the new targeted anti-avoidance rule (TAAR) introduced by the Finance Act 2016 designed to prevent "phoenixism". The TAAR addresses the use of voluntary liquidations to take cash out of a company (typically taxed as capital), with a subsequent resurrection of the same trade in another vehicle.

The letter confirms that HMRC will not provide clearance under the new rule, but states that guidance is to follow in due course. In the meantime, the letter gives some further insight as to the application of Conditions C and D of the TAAR. It confirms that Condition C (that the individual carries on the same or similar trade within two years of the distribution) is to be interpreted widely. Condition D (tax advantage main purpose requirement) then "narrows" the application of the rule.

The letter then gives some examples as to when the TAAR may, and may not, apply.

The letter can be viewed here.

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Look-through taxation for "small" companies – responses sought

On 18 July 2016, the Office of Tax Simplification (OTS) published a discussion document on proposals to "look through" certain "small" companies for tax purposes.

Under the proposals, shareholders in "small" companies would effectively be taxed as sole traders, or partners.

The type of companies that could be "small" for these purposes are those that:

- do not intend to increase in size
- are effectively one-person businesses
- distribute nearly all profit
- have few assets.

Comments are also sought on whether a monetary (eg turnover) limit would also be appropriate.

The paper identifies (and seeks comments on) a number of other issues arising from the proposals, such as the treatment of salaries, provision of benefits and interest on directors' loans.

The discussion document can be viewed here.

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International

European Commission decides Irish tax rules amounted to illegal state aid for Apple

On 30 August 2016, the European Commission (EC) announced its decision that Ireland had provided illegal state aid to Apple amounting to EUR 13bn, plus interest. This decision is part of a number of EC investigations of certain historic tax rulings made by tax authorities in Member States including Ireland, the Netherlands and Luxembourg.

The EC has, in the case of Ireland and Apple, found that the tax rulings gave Apple an unfair advantage (amounting to illegal state aid) as the rulings approved an artificial allocation of profits within two Irish incorporated Apple subsidiaries. The two Irish companies hold the rights to use the intellectual property of the Apple group to sell and manufacture Apple products outside of the Americas.

Apple's European sales operations were set up so that all sales (and therefore significant profits) were recorded in Ireland through these two companies. The Irish tax authority rulings agreed to an internal allocation of these profits so that the majority of the profits were allocation to a "head office" not located in Ireland (or indeed any other jurisdiction) and that had no premises or employees. Only a small proportion of these profits was allocated to the Irish branch of these Irish companies (and therefore subjected to Irish tax). The vast majority of the profits therefore escaped tax and resulted in an effective corporate tax rate of 1%, falling to 0.005% in 2014, on the profits of one of the companies.

The EC, in short, decided that this allocation of profits had no economic justification (as only the Irish branches, and not the "head office" had the capacity to generate the profits). In the EC's view, this allowed the Apple subsidiaries in Ireland to pay substantially less tax than others, and therefore to benefit from illegal state aid.

Both Apple and the Irish government quickly announced that they intended to appeal the EC's decision. Apple argues that most of its profits are taxed in the US, where the group's value is created. The EC's decision certainly gives rise to an unusual situation whereby a taxpayer has been told to pay historic overdue taxes to a national government that asserts such tax is not due. There are also suggestions from some in the US that this is part of an anti-American agenda in Brussels and that the US might take action against European companies in response.

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BEPS project: hybrid tax mismatch rules – OECD's views on branches

On 22 August 2016, the Organisation for Economic Co-operation and Development (OECD) published a discussion document on proposed branch mismatch rules, as part of its ongoing work on the base erosion and profit shifting (BEPS) project Action 2 (hybrid mismatches).

The document focuses on possible mismatches caused by international differences in (i) the characterisation of branches (permanent establishments), and (ii) the allocation of income between a branch and its head office.

As far as the UK is concerned, the hybrid mismatch rules introduced by Finance Act 2016 and due to take effect from 1 January 2017 already extend to permanent establishments. The OECD's further work in this area is therefore likely to have limited impact in the UK.

The discussion document can be viewed here.

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BEPS project: interest deductibility in banking and insurance industries – OECD's proposed approach

On 28 July 2016, the Organisation for Economic Co-operation and Development (OECD) published a discussion paper on its proposed approach to interest deductibility in the banking and insurance sectors.

In October 2015, the OECD published its final reports as part of the ongoing BEPS (base erosion and profit shifting) project. BEPS Action 4 addressed interest deductibility and the final proposal made by the OECD was for countries to limit an entity's net interest deductions to a fixed ratio of the taxable income generated by the entity's economic activities. At the time, however, the OECD recognised that further work would be needed in some areas, including the banking and insurance sectors.

Following on from the OECD's final proposals, the UK government quickly announced its intention to implement the OECD's recommendations on interest deductibility. In May 2016 a consultation was launched on a set of new rules on corporate interest deductibility, to take effect from 1 April 2017. The UK proposal, broadly, is to limit corporation tax deductions for net interest expense to 30% of a group's UK EBITDA. See here for our earlier commentary on the UK's proposals. The UK government said, at the time, that it would continue to work with the OECD to "develop appropriate rules for groups in the banking and insurance sectors".

The OECD paper recognises that the characteristics of banks and insurers may mean that the "general" approach proposed for interest deductibility under BEPS may not be appropriate as:

- banks and insurers will, typically, have net interest income rather than net interest expense. The proposed fixed and group ratio rules would therefore not limit the ability of such banks and insurers to deduct all their interest expense (even that which could be linked to BEPS)
- banks and insurers are subject to regulatory capital rules, requiring a minimum amount of equity and limiting the amount and ways in which debt can be used.

Therefore, the OECD states that individual countries could exclude banks and insurers from the scope of the proposed fixed and group ratio rules, in return for applying specific rules to such entities. The OECD also recognises that whilst banks and insurers have been grouped together for the purposes of the discussion paper, they are of course very different businesses and there is no requirement for a country to apply the same rules to each type of entity.

The discussion paper makes the following points, amongst others:

- a distinction should be made between BEPS risks posed by banks and insurers on the one hand, and BEPS risks posed by entities grouped with banks and insurers, on the other
- "Excessive" leverage is seen as more of a risk posed by entities grouped with banks and insurers (rather than the banks and insurers themselves)

- permanent establishments (PEs) of banks and insurers pose a particular issue as, in many countries, no regulatory capital rules apply to PEs. Such rules may, for the HQ of a bank or insurer, "naturally" produce an outcome that means a specific interest deductibility rule is not required.

It remains to be seen, as far as the UK is concerned, how the UK now deals with banks and insurers as part of the UK rules due to take effect from 1 April 2017.

The discussion paper can be viewed here.

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BEPS project: interest deductibility – OECD discussion paper on group ratio rule

On 11 July 2016, the Organisation for Economic Co-operation and Development (OECD) published a discussion document on the group ratio rule that forms part of its proposals on interest deductibility (Action 4 of the OECD's base erosion and profit shifting (BEPS)).

The OECD's proposals on Action 4 included the possibility of an entity being able to deduct interest expense up to its group ratio of net third party interest to EBITDA (the group ratio rule) if that were higher than the so-called fixed ratio rule (being a fixed ratio of profit, measured by EBITDA). In October 2015, when the OECD published its "final" BEPS reports, it did state that further work would be required in certain areas, including with regard to the group ratio rule.

This discussion paper is intended to provide "an additional layer of technical detail to assist countries in implementing the group ratio rule".

The paper gives a number of options for calculating the net third party interest expense of a group. The OECD's preferred approach, broadly, is to make the calculation by identifying both interest income and expense and payments economically equivalent to interest (whether starting with the group's financial statements or not). The paper also considers the definition of group EBITDA.

The proposals are complex and, somewhat inevitably, seek a fine balance between ensuring international conformity with the proposals and giving countries some leeway in terms of implementation.

The UK domestic legislation to implement the Action 4 proposals is due to take effect from 1 April 2017. One view is that the UK's implementation is somewhat premature, given the ongoing work being undertaken by the OECD.

The discussion paper can be viewed here.

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About RPC

RPC is a modern, progressive and commercially focused City law firm. We have 79 partners and over 600 employees based in London, Hong Kong, Singapore and Bristol.

"... the client-centred modern City legal services business."

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- **Winner – Law Firm of the Year – The Lawyer Awards 2014**
- **Winner – Law Firm of the Year – Halsbury Legal Awards 2014**
- **Winner – Commercial Team of the Year – The British Legal Awards 2014**
- **Winner – Competition Team of the Year – Legal Business Awards 2014**
- **Winner – Best Corporate Social Responsibility Initiative – British Insurance Awards 2014**

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16596

Tower Bridge House
St Katharine's Way
London E1W 1AA
T +44 20 3060 6000

Temple Circus
Temple Way
Bristol BS1 6LW
T +44 20 3060 6000

11/F Three Exchange Square
8 Connaught Place
Central Hong Kong
T +852 2216 7000

12 Marina Boulevard
#38-04 Marina Bay Financial Centre Tower 3
Singapore 018982
T +65 6422 3000