



Welcome

Hello and welcome to the February 2015 edition of the ADIT Student Newsletter.

This edition includes the latest news about the updated ADIT qualification structure, a round-up of the Autumn 2014 Admission Ceremony and December 2014 exams, guest features from members of the ADIT community, and information for students planning to sit exams this June.

Please keep checking the ADIT website for all the latest news, or follow our new Twitter feed (@CIOTADITStudent). You can also join our [LinkedIn group](#) to network with other ADIT colleagues.

We welcome your feedback on this edition of the Student Newsletter, and any suggestions for articles and items for us to include in future editions.

Key Exam Dates

28 February 2015

June 2015 exam registration deadline (entries received after this date incur a £100 late fee)

9-11 June 2015

June 2015 exams take place

5 August 2015 (20.00 BST)

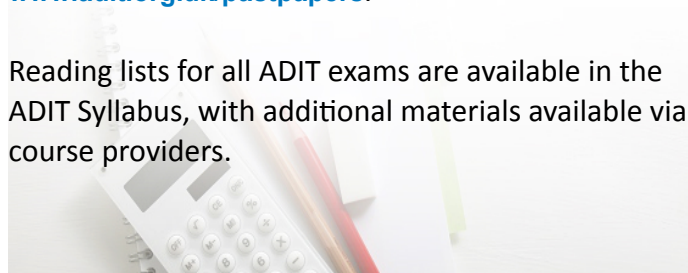
Publication of June 2015 pass lists at www.adit.org.uk/results

For all key ADIT dates in 2015, download our free Student Calendar at www.adit.org.uk/prospectus

Past Papers

If you're planning to sit ADIT exams this June, remember that previous question papers for all ADIT exam options, together with suggested solutions, Examiner reports and guidance notes, are free to download from our website at www.adit.org.uk/pastpapers.

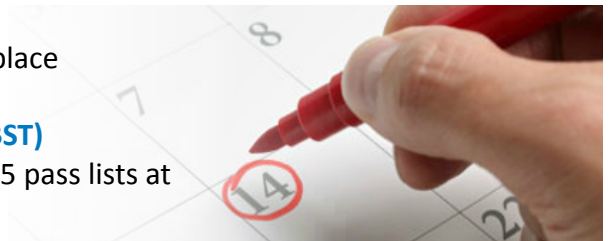
Reading lists for all ADIT exams are available in the ADIT Syllabus, with additional materials available via course providers.



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E: info@adit.org.uk | T: +44 (0)20 7340 0550 | [in](#) | [t](#)



New Staff Contact

Rhiannon Pardoe, Administrative Assistant

I'm very excited to have joined the Institute, as the newest member of the ADIT team. I work alongside Rory Clarke in the administration of the ADIT exams and the thesis option.

I am often busy helping to source exam centres and assist ADIT students around the world, and making sure that everything runs smoothly in relation to the practical aspects of running a large event like the ADIT exams in many countries at the same time.



The New Structure

You may well have noticed, from the 2015 editions of the ADIT Prospectus and Syllabus (as well as the website), that the various ADIT papers are now designated as **Paper 1**, **Paper 2** or **Paper 3** (rather than the previous Paper I, II, III designations).

The new designations form part of the changes to the ADIT qualification structure announced last summer, which are being introduced over the course of 2015 and 2016. Under the new structure, ADIT includes **Paper 2 - Advanced International Taxation (Jurisdiction)** and **Paper 3 - Advanced International Taxation (Thematic)** categories in place of the previous Paper II and III categories. The mandatory Paper I component remains unchanged, as **Paper 1 - Principles of International Taxation**.

The Paper 3 category now includes an expanded range of thematic options, while the new structure will, from June 2016, offer students the choice of **any two option papers** in addition to Paper 1. For full information about the changes, please visit www.adit.org.uk/aditischanging.

Library Resources

The following resources are available to all ADIT students, as well as Graduates, Affiliates and CIOT Members who have completed ADIT.

CIOT Library

The Tony Arnold Library is housed within the law



Last Chance for Paper 3.05

The June 2015 exam session will be the last opportunity for students to sit the Paper 3.05 United States option. This paper is to be withdrawn from the syllabus as the Paper 3 options focus on **thematic** areas of international tax. The existing Paper 2.10 United States option will remain available as a **jurisdiction** paper. Students who have completed Paper 3.05 will retain this pass under the new structure.

collection of King's College London. For more details visit www.tax.org.uk/library.

IBFD Library

The IBFD offers an extensive and inexpensive library service. For more details visit www.ibfd.org/library.

LinkedIn and Twitter

As a member of the ADIT community, you are invited to join our growing LinkedIn group. The group, which now has around 2,500 members, provides a platform for professional networking and discussion about international tax.

If you would like to join our LinkedIn group, please [click here](#) or visit www.adit.org.uk/linkedin.

You can join around 150 other ADIT students who keep up-to-date with the latest ADIT news, event participation and exam information, by following [@CIOTADITStudent](#), our dedicated Twitter feed for ADIT students.

To follow us on Twitter, please [click here](#) or visit www.adit.org.uk/twitter.



CIOT Admission Ceremonies

Autumn 2014

The ADIT awards for achievement were presented at the CIOT Admission Ceremony at the Drapers' Hall in the City of London on 30 October 2014.

Awards were presented for the highest marks attained in the following ADIT papers:

- The **Heather Self Medal** was won by Benjamin Luke Wythe, who is employed by EY in London.
- The **Raymond Kelly Medal** was won by Karen Laura Fisher, who is employed by EDF Trading Ltd in London.
- The **Worshipful Company of Tax Advisers Medal** was won by Anna Herrera, who is employed by PwC in Valletta.
- The **CCH Prize** was won by Alessandra La Via-Graham, who is employed by Micro Focus Ltd in Newbury.
- The 2013 **John Avery Jones Medal** was won by Jeremy Norman, who is employed by Chantrey Vellacott in London.

In addition, nine new ADIT Graduates and International Tax Affiliates of the CIOT attended the



CIOT President Anne Fairpo and ADIT Academic Board Chairman Jim Robertson (centre) with ADIT Graduates, Affiliates and Award Winners.

ceremony to receive their ADIT certificates, coming from as far away as Malta and the Netherlands.

Spring 2015

If you have completed ADIT since the Autumn 2014 Ceremony, or if you are a December 2014 ADIT Medal or Prize Winner, you should receive a formal invitation to the Spring 2015 Admission Ceremony together with your results.

December 2014 Exam Roundup

December 2014 saw the introduction of a second ADIT exam session to take place each year, making the ADIT qualification yet more accessible to tax professionals around the world. On-screen exams were sat at 46 locations, including new centres in Frankfurt, Kuala Lumpur and Washington, DC.

Congratulations to all ADIT students who passed an exam. Full pass lists, along with Medal and Prize winners, can be found at www.adit.org.uk/results.

Students who have successfully achieved ADIT following the December 2014 exams are eligible to become **International Tax Affiliates of the Chartered Institute of Taxation**. Affiliateship

confers a number of practical benefits; you can find more information at www.adit.org.uk/affiliate.

Sitting exams in June 2015?

The deadline for June 2015 exam entry is **28 February**. Please aim to submit your entry by this date. You can enter online at www.adit.org.uk.

June 2015 exams will be offered in both the handwritten and on-screen formats. You can download the on-screen software from **14 May**.

Full information about on-screen ADIT exams can be found online at www.adit.org.uk/onscreen. Any queries should be directed to info@adit.org.uk.



ADIT Network: News

6th Cyprus Professional Services Conference

ADIT was a sponsor at the IMH Cyprus Professional Services Conference in Nicosia, on Wednesday 24 September 2014. The event was attended by over 150 delegates from accounting, tax and legal firms, multinational corporations, and government.

18th Cross Atlantic and European Tax Symposium

ADIT exhibited at the CIOT/ATT European Branch's annual Cross Atlantic and European Tax Symposium in London, on Friday 21 November 2014.

Organised in association with IFA, the Symposium addressed topical international tax issues including hybrid mismatch arrangements, BEPS, and the impact of recent US and UK tax policy on taxpayer rights. Keynote addresses were delivered by Dr Achim Pross from the OECD, and Shabana Mahmood MP, Shadow Exchequer Secretary.

CIOT/ATT London Branch EU VAT event

The launch of the new ADIT EU VAT option paper was marked by a special CIOT/ATT London Branch

event, on 19 January 2015. The event featured a panel discussion by European VAT experts in accountancy and law, and was attended by ADIT students as well as CTA and ATT members.

ADIT at Future Networking Events

ADIT will be promoted at the following events over the coming months.

IFA USA 2015 Annual Conference | [More](#)

Washington, DC, USA | 26-27 February 2015

IFA Basel 2015 | [More](#)

Basel, Switzerland | 30 August - 3 September 2015

You can keep up-to-date with ADIT event participation via the **Notice Board** page of our website at www.adit.org.uk/noticeboard, or via our LinkedIn group and Twitter feed.

If you would like to recommend an event for ADIT participation, or for enquiries about networking opportunities and ADIT promotional materials, please contact us at info@adit.org.uk.

ADIT Network: My International Tax Life



In a new feature, ADIT Affiliate **Quang Tran-Trung Phan** highlights the ways in which his ADIT experience has impacted positively upon his international tax career.

I am currently the team leader of Transfer Pricing and Market Entry services in Deloitte

Vietnam's Ho Chi Minh City office. My team and I assist clients on TP compliance matters, providing advisory services on cross border transactions. We work closely with other Deloitte offices around the world, especially in Singapore, Australia, Germany and UK, for the consistent TP policies of our group clients. For Market Entry services, my team assists the client on providing tax and regulatory advice. We provide advice to new and existing clients

on business structuring in Vietnam, and the tax implications of their business activities.

I obtained my TP certificate in August 2011, and this helped me in getting to my current position. When I completed ADIT in August 2013, it was really exciting as I was the first Vietnamese student to achieve ADIT. I have been recognised by colleagues overseas, and invited to deliver training to Vietnamese authorities in the financial sector. I am now preparing materials to deliver training on international tax and TP for MBA courses in 2015. My next goal is to obtain an overseas position in international tax and TP or Australian tax, for which my ADIT experience will again be an advantage.

Quang completed ADIT in 2013, and currently works as a Tax Manager at Deloitte in Ho Chi Minh City, Vietnam.



ADIT Network: Guest Article

ADIT students share their advice...



In the latest contribution to our guest article series, ADIT tutor **Narelle McKenzie** – who delivers courses covering the United States option papers – shares some useful exam preparation tips and strategies collected from successful ADIT students.

Towards the end of each course that I have delivered, I ask participants – particularly those who have been successful in other papers – to share their tips on studying for ADIT exams.

One tip on advance preparation is to use highlighters to colour-code each relevant part of the tax code/legislation. This is generally the only text book you are able to take into the exam, and the colour-coding provides for easy reference during the time crunch of the exam. For example, for the United States option papers you are able to bring in the code and associated regulations, and the United States papers focus generally on inbound and outbound issues. For outbound issues, you are dealing with the subpart F rules – so would highlight the relevant part of the code and regulations in one colour. For the inbound rules, you would look to the thin capitalization and branch profits tax sections of the code and regulations and use another colour. The rules regarding the use of text in ADIT exams are strict, of course: you may highlight and underline, but you must not annotate or use tags.

Next, make use of past papers. This will enable you to look up the court and code citations, and quickly identify the relevant parts of the tax treaty for points to support the position you take in your responses. Examination of past papers reveals a pattern to the style of questions asked, so you can usefully practice drafting responses and time yourself, making sure that you are sticking to the 45 minute time cycle for answering each question in most ADIT exams exam.

A successful candidate will not only demonstrate an understanding of the relevant law, but should also show an awareness of current developments, so ensure you understand the current hot topic in the international area of the paper you are sitting. For example, for the United States papers in 2015 I would suggest being conversant with the September 2014 Notice on inversions. I also recommend learning the impact of FATCA on payments made by US persons to non-US persons, as the FATCA rules override tax treaties.

During the exam, ensure you strictly allocate your time so that you have sufficient time to address each question. For example, in the Paper 3.05 United States option exam, you have to answer two questions from a choice of three questions in Parts I and II. It's a good idea to determine which question you least want to answer – so spend the first few minutes of the reading time scanning through the options. You should then allocate 45 minutes to each question.

In contrast, to complete the Paper 2.09 United States option exam you must answer all questions. Here, you should rank the questions in order, starting with your least favoured question. Note the issues and analysis so that you have something recorded as a response (spend five minutes or so doing this), and then start addressing the question that you know best and work back through the list. Again, it makes sense to allocate equal amounts of time to each question, but by having spent 5-10 minutes recording some response for your least desirable question you relieve some of the stress of dealing with it.

While I am most familiar with the United States papers, the above tips from students also apply to other papers, and I wish every person sitting the ADIT exams in 2015 the very best of luck with their studies.

Narelle teaches ADIT courses, and can be contacted via email at info@djhinternationaltax.com.



Future Events

ADIT students are welcome to participate in any of the following events. To find out more details about an event, please click on the [More](#) link.

- | | |
|----------------|---|
| 26-27 February | IFA USA 2015 Annual Conference Ritz-Carlton, Washington, DC, USA More
International tax event organised by the USA branch of the International Fiscal Association (IFA). |
| 3-4 March | DJH Annual US Expat Tax and Finance Conference Dexter House, London, UK More
Annual event aimed at US-focused tax practitioners, addressing issues in international taxation affecting US expats. |
| 9 March | CIOT/ATT European Branch Paris Breakfast Seminar Mazars, Paris, France More
Event addressing the question 'Is the UK really a tax haven?', and including discussion led by experts in international aspects of the UK tax system. |
| 26 March | CFE Forum 2015 Representation of the State Saxony-Anhalt, Brussels, Belgium More
Annual Confédération Fiscale Européenne (CFE) forum, with this year's event entitled 'Tax governance and tax risk management in a post-BEPS world'. |
| 27-29 March | CIOT Spring Residential Conference 2015 Queens' College, Cambridge, UK More
Annual CIOT event featuring a range of lectures on topical UK and international tax issues, presented by leading tax speakers and supported by group working sessions. |
| 16-17 April | IFA Asia-Pacific Regional Tax Conference Marina Bay Sands, Singapore More
International tax event organised by the Singapore branch of IFA. |
| 21 May | CIOT/ATT London Branch Discussion Group: Residence Tips and Traps FTI Consulting, London, UK More
Discussion event addressing tax residence issues, including guest speakers from EY. |
| 18 June | CIOT/ATT London Branch Discussion Group: EU Law Update QMUL, London, UK More
Discussion event organised in co-operation with the Centre for Commercial Law Studies at Queen Mary University of London, as part of the QMUL Annual Summer Tax Programme. |

In addition to the events listed above, the 42 Branches within the CIOT's Branch Network, including our seven international Branches, organise events attended by top tax lecturers. For further information on CIOT Branch conferences and other events, please visit www.tax.org.uk/members/events.



Future Courses

Course providers offer ADIT-relevant courses around the world. These courses can be an ideal way of supplementing your exam preparation or simply enhancing your understanding of a topic.

To enrol, please contact the course provider or click on [More](#). Course providers are listed alphabetically.

DJH International Tax | [Website](#)

Paper 3.03 - Transfer Pricing option course | 23-26 March 2015 | London, UK | [More](#)

Paper 3.05 - United States option course | 23-26 March 2015 | London, UK | [More](#)

Paper 1 course | 30 March - 2 April 2015 | London, UK | [More](#)

Paper 2.10 - United States option course | 30 March - 2 April 2015 | London, UK | [More](#)

Globaltraining | [Website](#)

Paper 2.03 - Cyprus option course | 13 March - 3 May 2015 | Nicosia, Cyprus | [More](#)

Paper 1 course | 3 April - 10 May 2015 | Nicosia, Cyprus | [More](#)

Paper 3.02 - EU VAT option course | 1-29 May 2015 | Nicosia, Cyprus | [More](#)

IBFD | [Website](#)

Paper 3.02 - EU VAT option course | 9-11 March 2015 | Amsterdam, Netherlands | [More](#)

Paper 1 course | 20-24 April 2015 | Amsterdam, Netherlands | [More](#)

Paper 3.04 - Upstream Oil and Gas option course | 27-29 May 2015 | Amsterdam, Netherlands | [More](#)

International Management Forum | [Website](#)

Paper 3.03 - Transfer Pricing option course | 19 March 2015 | Distance learning | [More](#)

Paper 3.03 - Transfer Pricing option course | 16 April 2015 | Distance learning | [More](#)

Irish Tax Institute | [Website](#)

Paper 3.03 - Transfer Pricing option course | 15 February - 16 May 2015 | Dublin, Ireland and Online | [More](#)

Pantelis Stylianides Institute of Accountancy | [Website](#)

Paper 3.03 - Transfer Pricing option course | 14 February - 23 May 2015 | Nicosia, Cyprus | [More](#)

Sheltons International Tax Training Institute | [Website](#)

Paper 1 course | 9-13 March 2015 | Rio de Janeiro, Brazil | [More](#)

Paper 3.04 - Upstream Oil and Gas option course | 28-30 April 2015 | Houston, TX, USA | [More](#)

Taxmann | [Website](#)

Paper 1 course | February - June 2015 | Correspondence and Online | [More](#)

Paper 2.05 - India option course | February - June 2015 | Correspondence | [More](#)

Paper 3.03 - Transfer Pricing option course | February - June 2015 | Correspondence and Online | [More](#)

This is not an exhaustive list of ADIT courses, but reflects those which have been recently announced and circulated to the CIOT. For further information on ADIT courses and course providers, please visit the **Course Provision** page of the website at www.adit.org.uk/courses.

All courses are offered independently of the CIOT. Courses do not include ADIT exam entry; exam entries must be made directly to the CIOT. Course bookings and payments are made to the course provider.



Exam Centres for June 2015

To provide maximum flexibility and convenience to ADIT students, ADIT exams have since 2014 been available at an expanded number of international locations.

All exam centre fees for our most popular exam centres, which are now categorised as **regular exam centres**, are included in the ADIT exam entry fee.

Candidates choosing to sit ADIT exams at a **special exam centre** will incur an additional exam centre fee, to be paid directly to the centre.

Further information about all June 2015 exam centres, including addresses and contact details for fee payments to special exam centres, will be sent to candidates via email on **1 May 2015**.

Regular Exam Centres (No additional exam centre fee payable)

Australia Sydney	Brazil Sao Paulo	Cyprus Nicosia	Egypt Cairo
Greece Athens	Hong Kong Hong Kong	India Chennai	India Mumbai
Indonesia Jakarta	Ireland Dublin	Kazakhstan Almaty	Kenya Nairobi
Malta Valletta	Mauritius Beau Bassin	Romania Bucharest	Singapore Singapore
Spain Madrid	Switzerland Lucerne	UAE Dubai	Uganda Kampala
UK London	USA New York		

Special Exam Centres (Additional exam centre fee payable)*

Albania Tirana	Armenia Yerevan	Azerbaijan Baku	Bulgaria Sofia
Canada Edmonton	China Shanghai	France Paris	Germany Frankfurt
Ghana Accra	Guernsey St Peter Port	Guyana Georgetown	India Bangalore
India Delhi	Isle of Man Douglas	Italy Milan	Japan Tokyo
Malaysia Kuala Lumpur	Netherlands Amsterdam	Nigeria Lagos	Pakistan Islamabad
Pakistan Karachi	Poland Warsaw	Russia Moscow	Slovakia Bratislava
South Africa Johannesburg	Tanzania Dar es Salaam	Ukraine Kiev	USA Houston
Vietnam Ho Chi Minh City			

*All exam centre fees for special exam centres are paid directly to the centre

Up-to-date information about all ADIT exam centres can be found online at www.adit.org.uk/examcentres.

Want to Sit Your Exams in December 2015?

In addition to the June exams, on-screen sittings of the most popular ADIT papers are now available each December, at ADIT exam centres around the world.

A full list of regular and special exam centres for the December 2015 exam session will be available from 30 April 2015, via the **Exam Centres** page of our website at www.adit.org.uk/examcentres.

If you would like to sit your December 2015 ADIT exams in a location which is not listed as either a regular or special exam centre, you will need to notify us of your preferred location **no later than 30 June 2015**.

The exam entry period for December 2015 ADIT exams will open on **30 April**, and close on **7 September 2015**.