

Advanced Diploma in International Taxation



www.adit.org.uk

ADIT is a specialist advanced qualification in international and cross-border taxation and provides the global benchmark for practitioners of international corporate taxation, regardless of industry or location.

About ADIT

Today's international tax professional will have a varied background and the expectation is that he or she will be increasingly mobile and will need an understanding of more than one taxation system. The Advanced Diploma, developed and supervised by leading international tax practitioners and academics, meets the needs of international tax practitioners working in the corporate arena. It is a challenging and rigorous designation but will reward you, your career, your employer and your client. ADIT is an independent means of demonstrating international tax expertise to a global standard.

Leadership

The qualification is supervised by an Academic Board consisting of international tax practitioners and scholars:

- John Avery Jones
- Philip Baker
- Malcolm Gammie
- Kees van Raad
- Jefferson VanderWolk
- Richard Vann

ADIT Program

- The Advanced Diploma consists of three examinations, although a thesis may be substituted for either Paper II or Paper III (but not both).
- Exams are modular and can be taken in any order. There is one exam session per year. Candidates may choose to sit as many or as few exams at each sitting as they wish and if unsuccessful, exams can be sat as many times as desired.
- Candidates must choose different jurisdictions for Paper II and III.
- Exams can be sat at a global network of exam centres.
- Candidates can choose their own mode of study.

The Global Standard in International Tax

Examinations

Paper I – Principles of International Taxation

This paper is not country-specific, but focuses on key issues such as Principles of International Tax Law, Residence, Double Taxation conventions and Treaty interpretation, transfer pricing, the work of the OECD and international tax avoidance.

Paper II – Advanced International Taxation – Primary jurisdiction

Candidates are expected to have a detailed knowledge of a primary jurisdiction's tax regime regarding international tax matters.

Available in the following options:

A – United Kingdom option

This paper covers areas such as UK CFC legislation, double tax relief, thin capitalisation, reorganisations, transfer pricing, application of corporation tax to cross-border situations and anti-avoidance provisions.

B – United States option

This paper covers in detail the federal income tax, with particular emphasis on in-bound and out-bound cross-border situations, US tax treaties, transfer pricing and cross border mergers and acquisitions. It also includes basic rules and cross-border issues on federal estate tax, federal gift tax and state and local taxes.

C – Hong Kong option

This paper covers the Hong Kong income tax system as it affects individuals and corporate businesses, with particular emphasis on international trading, and includes various special categories of taxpayer, tax administration, double tax relief and tax planning. It also covers the Hong Kong estate duty and stamp duty.

D – Singapore option

This paper covers the main income taxation issues typically encountered by global businesses operating in a territorial-based taxation economy that is highly dependent on international trade. The topics serve to highlight tax planning opportunities in cross border activities. GST planning is being seen as a vital tool in shaping corporate competitiveness as the state increases its dependence on it as a stable source of tax revenue.

E – Malta option

This paper covers the structure of the Maltese tax system with particular emphasis on Income Tax, Income Tax from Capital Gains, Property transfers Tax, Duty on Documents and Transfers and VAT.

F – Australia option

This paper covers the structure of the Australian tax system with particular emphasis on Income Tax, Fringe Benefits Tax and Goods and Services Tax.

Paper III – Principles of Corporate and International Taxation – Secondary jurisdiction

Candidates are expected to be aware of the key features of the corporate tax system and be able to answer questions on international tax in relation to a secondary jurisdiction without being expected to offer detailed advice on that jurisdiction's domestic tax system.

Available in the following options:

A – United States option

This paper covers the structure of the US tax system, overview of federal income tax, inbound investment, outbound investment, transfer pricing, anti-avoidance and partnerships.

B – European Union option

This paper examines the impact of European Union Law on all aspects of taxation for all Member States. The paper includes the background to Union Law in the Treaties and the role of the various Union institutions.

C – United Kingdom option

This paper covers the structure of the UK tax system with particular emphasis on international aspects as well as the major principles of UK corporate tax, and the taxation of shareholders and employees.

D – China option

This paper covers the structure of the Chinese tax system with particular emphasis on Individual Income Tax, Enterprise Income Tax and inbound and outbound investment taxes.

E – Australia option

This paper covers the structure of the Australian tax system with particular emphasis on Income Tax and inbound and outbound investment taxes.

F – Transfer Pricing option

This paper covers the fundamentals of transfer pricing based on the OECD model. The paper will focus on transfer pricing methods, the arm's length principle, comparability, compliance issues and avoiding double taxation and dispute resolution. Candidates who pass this examination are eligible to apply for a certificate.

Thesis option – Paper II/Paper III

Candidates have the option of writing a body of work as an alternative to either (but not both of) Paper II or Paper III. The thesis must be between 15,000 and 20,000 words on international taxation.

Please see the syllabus for full details at

<http://www.tax.org.uk/adit/Prospective+Students>

Paper I – Required	Paper II	Paper III	Thesis (optional)
Principles of International Taxation*	Demonstrate detailed knowledge of chosen option primary jurisdiction's tax regime regarding international tax matters	Demonstrate awareness of key features of the corporate tax system and information on international tax in relation to the chosen secondary jurisdiction	Alternative to either Paper II or Paper III. Body of work on some aspect of international tax in relation to any tax jurisdiction – 15,000 to 20,000 words.
	Option – UK Option – USA Option – Hong Kong Option – Singapore Option – Malta Option – Australia	Option – USA Option – EC Option – UK Option – China Option – Australia Option – Transfer Pricing*	

* available as stand-alone certificates

Study Options

The Chartered Institute of Taxation (CIOT) does not provide courses, training, or materials and relies on academic institutions, and commercial training and course providers. These fall into the following categories:

- ADIT Specific – courses specifically designed to prepare students for the ADIT exams
- Distance Learning – materials and support from a course provider but no classroom attendance required
- In-House training – the course provider comes to your organisation
- Classroom courses – provided by other professional bodies, commercial tuition providers, and academic institutions, for their purposes, which help in preparing for the ADIT exams
- Self Study

For more information please visit <http://www.tax.org.uk/adit/Prospective+Students/Course+Providers>

Facts and figures

- 1,400+ graduates, affiliates* and students – 55% are outside the UK
- 86 different countries represented – every continent, major market centre, and every business sector
- Average age 37 yrs
- 60% men, 40% women

*ADIT Affiliates are those who have completed the ADIT qualification, and have chosen to apply to become an "International Tax Affiliate of The Chartered Institute of Taxation" paying an annual subscription. Holders of the qualification they may use the designatory letters "ADIT". Those who have passed the qualification (ADIT Holders although sometimes referred to as "Graduates") may use the designatory letters 'ADIT' but may not be called an ADIT Affiliate unless they pay the annual subscription. ADIT students are those who are registered as students but have not yet passed the qualification and may not use the designatory letter "ADIT".

Certificates

Candidates who pass Paper I – Principles of International Taxation or Paper III – Transfer Pricing examinations are eligible to apply for a certificate. For further information please visit <http://www.tax.org.uk/adit/applicationforms>

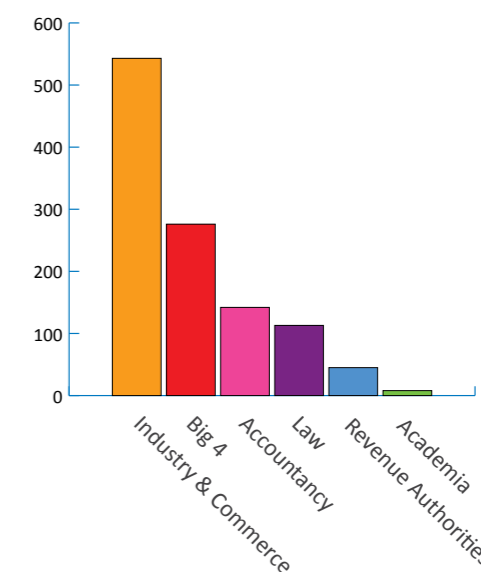
Registration and fees

Student registration fee is £180. The fee for the 2011 examination will be £140 per paper. A proposal form for the thesis may be submitted at any time and the fee for thesis submission is £150.

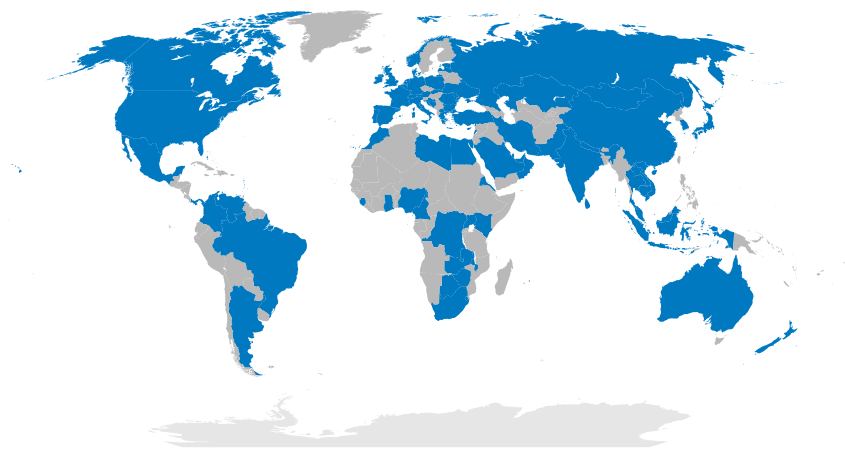
Contact

For more information please contact us at sscott-joseph@adit.org.uk or +44 (0)20 7340 0550.

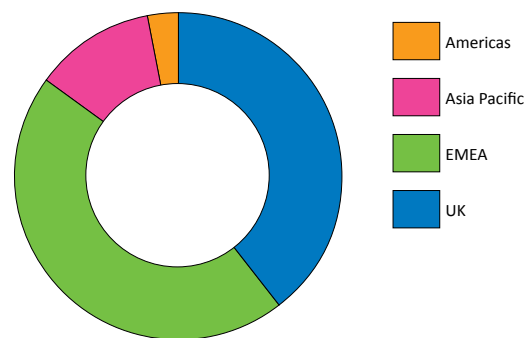
Industry Sector of ADIT Population



ADIT around the globe...



Geographical profiles of ADIT population



What people say...

“Having worked in International Tax for a few years, I thought it would be good to strengthen, formulate and progress my understanding further by enrolling and completing the ADIT examinations. I decided with the background that I had in the International Tax area that I would complete the examinations in one sitting, this was challenging, hard work and enabled a clearer understanding of some of the principals of International tax which I believe were helpful in practice. I would recommend those seriously wanting to pursue a career in this field to undertake this study.”

Gurthian Ghotra
Tax Director,
McCormick Europe

“Studying ADIT and gaining the qualification proves to your employer that you are serious about international tax and about pursuing an international career. Studying for ADIT has allowed me to build up broader knowledge in international tax than I would get by just gaining experience on the job”

Doris Gonzalez-Hurtado
Tax Manager, Tax Germany and Austria, *Procter & Gamble*

“It can be quite difficult for in-house international tax specialists to acquire a deep and broad technical knowledge base on which to build their practical experience. The ADIT is a unique qualification which perfectly meets this need and was designed with this in mind. There is no better way for a tax generalist or an international practitioner qualified by experience to acquire the full theoretical underpinning in a cost effective manner. I would regard the ADIT as a huge advantage when recruiting for international tax specialist roles.”

Paul Morton
Head of Group Tax,
Reed Elsevier Group plc

“ADIT provides in-depth knowledge of international taxation that is invaluable to a global organisation like Michelin. It enhances the value that I am able to add to the business and provides opportunities to extend my horizons beyond the UK. I am currently based in the United States and previously France. The understanding of general principles gained from ADIT enables me to identify key tax issues in any of the 170 countries where Michelin is present. When confronted with unfamiliar tax regimes, ADIT helps me to ask the right questions.”

Robert Johnstone
Director of International Taxation, *Michelin USA*

About the CIOT

The Chartered Institute of Taxation (CIOT) is a charity and the leading professional body in the United Kingdom concerned solely with taxation.

The CIOT's primary purpose is to promote education and study of the administration and practice of taxation both in the UK and internationally. One of the key aims is to achieve a better, more efficient, tax system for all affected by it – taxpayers, advisers and the authorities. The CIOT's comments and recommendations on tax issues are made solely in order to achieve its primary purpose: it is politically neutral in its work.

The CIOT administers and awards two professional tax qualifications: the Chartered Tax Adviser (CTA) for tax advisers practicing UK tax, and the Advanced Diploma in International Taxation (ADIT) for tax advisers, regardless of their location or industry, practicing international corporate taxation. The CIOT's 15,500 members have the practising title of 'Chartered Tax Adviser' and the designatory letters 'CTA'. ADIT affiliates have the practising title of 'International Affiliate of the Chartered Institute of Taxation' and the designatory letters 'ADIT'.

