

# School of Taxation and Business Law

## TABL3757 CORPORATE TAX STRATEGY

### Course Outline Semester 2, 2017

### Course-Specific Information

The Business School expects that you are familiar with the contents of this course outline. You must also be familiar with the Course Outlines Policies webpage which contains key information on:

- Program Learning Goals and Outcomes
- Academic Integrity and Plagiarism
- Student Responsibilities and Conduct
- Special Consideration
- Student Support and Resources

This webpage can be found on the Business School website:

<https://www.business.unsw.edu.au/degrees-courses/course-outlines/policies>

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## COURSE-SPECIFIC INFORMATION

### 1 STAFF CONTACT DETAILS

Position	Name	Email	Room	Phone
Lecturer	Pamela Hanrahan	<a href="mailto:p.hanrahan@unsw.edu.au">p.hanrahan@unsw.edu.au</a>	Quad 2076	93859550
Lecturer in charge	John Taylor	<a href="mailto:c.taylor@unsw.edu.au">c.taylor@unsw.edu.au</a>	Quad 2060	93853292

#### Communication with Staff

When you contact staff by email please:

- Use your university email address
- Specify the course TABL3791 as your lecturer may be teaching more than one course.
- Sign off by using your name and zid

### 2 COURSE DETAILS

#### 2.1 Teaching Times and Locations

Seminars are held from Weeks 1 to 13 in Webster 256 on Mondays from 10am to 1pm. There will be no class in Week 10 (2<sup>nd</sup> October) due to the NSW Public Holiday. For this reason there will be a class in Week 13.

This course is taught in parallel to both undergraduate and postgraduate students. Different assessments are used for undergraduate and postgraduate students.

#### 2.2 Units of Credit

The course is worth 6 units of credit.

#### 2.3 Summary of Course

This course does not purport to be an exhaustive analysis of the corporate and tax law considerations relevant to all business decisions. Rather, its focus is on areas where corporate and tax law considerations have a significant influence on business decision making. These are:

- the raising of corporate finance
- corporate distributions
- corporate reorganisations
- consolidations
- mergers and demergers

In addition to an analysis of relevant provisions of the *Corporations Act 2001*, *Competition and Consumer Act 2010* and the *Income Tax Assessment Act 1936* and the *Income Tax Assessment Act 1997* the subject will examine contemporary real life examples of problems and issues that arise in these areas.

## 2.4 Course Aims and Relationship to Other Courses

This course builds on the previous studies of students in *Business Entities* and in *Business Taxation*. It is concerned with the relationship between corporate law, taxation law and business decision making.

This course aims to:

1. Provide you with an understanding of the key elements of corporate tax strategy;
2. Build on your existing knowledge base by identifying issues and problems and alternative approaches in relation to corporate tax strategy in Australia;
3. Enhance your expertise in reading and understanding primary source material relevant to corporate tax strategy in Australia;
4. Develop your skills in applying relevant primary source materials in the context of case studies corporate tax strategy in Australia;
5. Develop your abilities in researching issues relating to corporate tax strategy in Australia through the use of secondary source material;
6. Give you more experience in working in teams in researching and delivering a presentation;
7. Give you more experience in publicly presenting and defending a paper;
8. Raise your awareness of ethical issues arising in corporate tax strategy.

## 2.5 Student Learning Outcomes

The Course Learning Outcomes are what you should be able to DO by the end of this course if you participate fully in learning activities and successfully complete the assessment items.

The Learning Outcomes in this course also help you to achieve some of the overall Program Learning Goals and Outcomes for all undergraduate students in the Business School. Program Learning Goals are what we want you to BE or HAVE by the time you successfully complete your degree (e.g. 'be an effective team player'). You demonstrate this by achieving specific Program Learning Outcomes - what you are able to DO by the end of your degree (e.g. 'participate collaboratively and responsibly in teams').

For more information on the Undergraduate Program Learning Goals and Outcomes, see <https://www.business.unsw.edu.au/degrees-courses/course-outlines/policies>

By the end of this course you should be able to:

1. Identify key issues relevant to corporate tax strategy in a given fact situation.
2. Locate and use resources that will assist you in developing a response to issues arising in corporate tax strategy.

3. Explain your response to issues arising in corporate tax strategy through oral and written presentations.
4. Identify different outcomes that result when different tax planning strategies are used in relation to corporate tax strategy.
5. Work in a team to identify issues and propose solutions to problems.
6. Evaluate ethical considerations arising when alternative tax planning strategies are used in relation to corporate tax strategy.

The Course Learning Outcomes are what you should be able to DO by the end of this course if you participate fully in learning activities and successfully complete the assessment items.

The Learning Outcomes in this course also help you to achieve some of the overall Program Learning Goals and Outcomes for all undergraduate students in the Business School. Program Learning Goals are what we want you to BE or HAVE by the time you successfully complete your degree (e.g. 'be an effective team player'). You demonstrate this by achieving specific Program Learning Outcomes - what you are able to DO by the end of your degree (e.g. 'participate collaboratively and responsibly in teams').

For more information on the Undergraduate Program Learning Goals and Outcomes, see: <https://www.business.unsw.edu.au/degrees-courses/course-outlines/policies>

The following table shows how your Course Learning Outcomes relate to the overall Program Learning Goals and Outcomes, and indicates where these are assessed (they may also be developed in tutorials and other activities):

Program Learning Goals and Outcomes		Course Learning Outcomes	Course Assessment Item
<i>This course helps you to achieve the following learning goals for all Business undergraduate students:</i>		<i>On successful completion of the course, you should be able to:</i>	<i>This learning outcome will be assessed in the following items:</i>
1	Knowledge	Identify key issues relevant to corporate tax strategy in a given fact situation.	<ul style="list-style-type: none"> <li>• Simulation Game Report</li> <li>• Real World Case Study Report</li> <li>• Exam</li> </ul>
2	Critical thinking and problem solving	Identify different outcomes that result when different tax planning strategies are used in relation to corporate tax strategy.	<ul style="list-style-type: none"> <li>• Simulation Game Report</li> <li>• Exam</li> </ul>
3a	Written communication	Explain your response to issues arising in corporate tax strategy through oral and written presentations.	<ul style="list-style-type: none"> <li>• Real World Case Study Report</li> <li>• Real World Case Study Presentation</li> </ul>
3b	Oral communication	Explain your response to issues arising in corporate tax strategy through oral and written presentations.	<ul style="list-style-type: none"> <li>• Simulation Game Report</li> <li>• Real World Case Study Report</li> <li>• Real World Case Study Presentation</li> </ul>

4	Teamwork	Work in a team to identify issues and propose solutions to problems.	<ul style="list-style-type: none"> <li>Simulation Game Report</li> </ul>
5a.	Ethical, social and environmental responsibility	Evaluation ethical considerations arising when alternative tax planning strategies are used in relation to corporate tax strategy.	<ul style="list-style-type: none"> <li>Real World Case Study Report</li> </ul>
5b.	Social and cultural awareness	Not specifically addressed in this course.	

### 3 LEARNING AND TEACHING ACTIVITIES

#### 3.1 Approach to Learning and Teaching in the Course

The teaching philosophy underpinning the course is aimed at:

##### ***Promoting deep learning by:***

- Discussing detailed technical provisions against the background of the issues and problems underpinning them, of alternative approaches to them and of basic tax policy objectives;
- Limiting the breadth of material dealt with in the course so the above issues are highlighted and significant structural features are examined;
- Involving you in the learning process through simulation, class discussions of case studies, and student presentations of real world case studies;
- Raising your awareness of ethical aspects of business decisions.

##### ***Developing your skills by:***

- Requiring you to read and apply primary source materials in the context of practical case study examples;
- Requiring you to find, read and analyse major secondary works relevant to the background issues, problems, alternative approaches and policy underpinnings of relevant provisions in the income tax law;
- Requiring you to work in groups and to agree on the format of presentations in the simulation game;
- Requiring you to make oral and media assisted presentations of real world case studies in class.

##### ***Recognising the different learning styles of individuals by:***

- Using a variety of teaching approaches including: lecturer presentations; in class discussions of case studies; simulation games, and student presentations of real world case studies;

- Using a variety of types of assessment techniques including: participation in the simulation game; presentation of a real world case study, and a final examination

### **3.2 Learning Activities and Teaching Strategies**

The method of teaching in this course will take the form of lectures, discussion of case studies, presentation of real world case studies by students, and small group activity in a simulation game.

The purpose of lectures is to provide you with an outline of the main statutory provisions and case law relevant to the issues discussed in the course. Lectures are not intended to be a substitute for reading and analysing primary source material and opinions of commentators in textbooks and journal articles. To prepare for lectures you should read the references for the week in question in the course Reading Guide before attending the relevant lecture.

The purpose of in class discussion of case studies is to illustrate the application of principles in hypothetical fact situations. It is important that you prepare for case study discussions by reading the references for the week in question in the Reading Guide and by thinking about the possible issues in the case study before attending the relevant class in which the case study is discussed.

You will be required to research, write up and present in class a Real World Case Study. Details of the requirements for the Real World Case Study are set out later in this Course Outline. This activity has several purposes. These include: (a) building your awareness of the application of the principles discussed in the course in real world situations; (b) developing your written and oral presentation skills; (c) enhancing your skills in researching current issues in business practice; (d) raising your awareness of ethical issues associated with corporate tax planning strategies.

Another form of assessment used in the course is a simulation game. You will be allocated to a team for the simulation game. The simulation game also has several objectives. To prepare for each simulation game you will need to contact other members of your team to discuss the issues raised in the previous and in the next game. If your team is presenting its recommendations in the next game then you will need to discuss how the presentation will be made, whether it will be broken up into components and who will present each component part. You will need to research the technical issues that the next game involves and will also need to think about strategic issues associated with the next game. You should also anticipate questions that other teams may ask of your team in the game and should think about how you propose to answer those questions. If your team is not making the presentation it is also desirable for your team to meet prior to the game to identify questions that you would like to ask the team which is presenting. It is important for you to think about how decisions made in one game affect options in subsequent games.

## **4 ASSESSMENT**

### **4.1 Formal Requirements**

In order to pass this course, you must:

- achieve a composite mark of at least 50; and
- make a satisfactory attempt at all assessment tasks (see below).

### **4.2 Assessment Details**

Assessment Task	Weighting	Length	Due Date
1. Reports of Simulation Game	20%	3 x 250 to 500 words	21 <sup>st</sup> August 18 <sup>th</sup> September 16 <sup>th</sup> October
2.Real World Case Study Paper and Presentation	25% Paper 15% Presentation	2500 words + executive summary 5 – 10 minutes presentation	3 <sup>rd</sup> October (paper) Presentations: 16 <sup>th</sup> and 23 <sup>rd</sup> October
3.Final Examination	40%	Two questions take home examination format	In UNSW S2 exam period at date to be advised.

#### **4.2.1 Simulation Game**

To assist in achieving Course Aims 1, 2, 4, 5, 6, 7 and 8 you will be required to participate in and report on a simulation game, the details of which are as follows:

#### **NEW ARK Pty Ltd**

New Ark Pty Ltd is the trustee of the Warren Alvin unit trust, which is a private unit trust. The unitholders in the Warren Alvin unit trust and the shareholders in New Ark Pty Ltd are Warren Pty Ltd and Alvin Pty Ltd which are both Australian resident companies. The shareholders in Warren Pty Ltd are Peter Warren (an Australian resident sui juris natural person), his sister Mary Warren (an Australian resident sui juris natural person) and his other sister Naomi Warren (an Australian resident natural person aged 16 years). Alvin Pty Ltd is the trustee of the Joseph Alvin Family Trust, which is a discretionary trust. The objects of the trustee's discretion are Joseph Alvin (an Australian resident sui juris natural person), Sophia Alvin (Joseph's wife and an Australian resident sui juris natural person), Frederick Alvin (their son, an Australian resident natural person aged 17 years) and David Alvin (their younger son who is an Australian resident of unsound mind).

The business of the Warren Alvin Unit Trust may be broadly described as eco tourism and related products. The Warren Alvin Unit Trust, trading as New Ark, conducts wildlife sanctuaries in several Australian States. New Ark Pty Ltd has the following wholly owned subsidiaries: Eco Fence Pty Ltd (which manufactures cat and fox proof fences for use in New Ark's ecoparks and for sale to the public); Ark Stay Pty Ltd (which provides ecological tourist accommodation at New Ark wildlife sanctuaries); Solar Ark Pty Ltd (which conducts research into solar energy with the aim of using products that it develops in ecoparks and of selling products to the public), and Admin Ark Pty Ltd (which provides various administrative and marketing services for the New Ark group). Most of the employees in the group are employed by Admin Ark Pty Ltd which provides their services as consultants to other group companies and to the Warren Alvin Unit Trust. All shares that New Ark Pty Ltd holds are held as trustee of the Warren Alvin Unit Trust.

The Warren Alvin Unit Trust's business commenced 15 years ago. At that time the business consisted of one ecopark conducted by the Warren Alvin Unit Trust. The different subsidiaries of New Ark Pty Ltd were introduced over time as business expanded.



The balance sheets and last year's profit and loss statements for the Warren Alvin Unit Trust and for all companies in the New Ark group are set out on the course Web CT page.

The Warren Alvin Unit Trust's business has grown considerably in the last 10 years. The Alvin and Warren families now wish to capitalise on that growth by selling a 49% interest in the group through a public float.

#### Tasks

- To develop the most tax effective strategy possible for floating a 49% interest in the New Ark group.
- To develop a tax effective structure for the future operation of the Warren and Alvin families' investments in the New Ark group.

The Simulation Game will be played over three weeks as follows:

#### Week Four:

- Brainstorming in groups on issues in case study
- Assignment of students to groups to look at particular issues eg:
- Choice of float vehicle: Corporate Law & general financial issues re choice of float vehicle;
- Capital restructuring (increase in capital; returns of capital; buy backs; consolidation and subdivision of shares; share conversions)
- Relevant roll over provisions (eg unit in unit trust for shares in company; scrip for scrip)
- Consolidations and intra-group transactions (asset transfers, loss transfers etc)
- Schemes of arrangement
- De-merger provisions and Liquidations

#### Week Eight

- Preliminary report from groups looking at Choice of float vehicle and at Capital restructuring issues
- Other groups adjust their research having regard to preliminary report from the Choice of Float Vehicle group and the Capital Restructuring group

#### Week Eleven

- Preliminary report from the Consolidations & Intra Group Transfers Group and the Roll-over Group
- Other groups adjust their research having regard to preliminary report from the Consolidations And Intra Group Transfer Group and the Roll-over Group
- Reports from the Schemes of Arrangement Group and the Demergers and Liquidation Group
- Discussion and agreement on final recommendations

In the New Ark Simulation Game you will receive marks for your report of the discussions and decisions made on each evening that the Simulation Game is played. Your report should take into account any written materials prepared by your group or other groups that were discussed that evening. Your report should also contain your reflections on why any decisions that were made in the Game that evening were made. Your report should also contain reflections on what (if anything) you think you learnt through preparation for and through playing the Simulation Game. Your report should also document your involvement in preparing any Group materials used in the Simulation Game and should document your involvement in the discussions in the Simulation Game.

Your reports of each element of the Simulation Game are due as follows:

- 1<sup>st</sup> Report Monday 21<sup>st</sup> August
- 2<sup>nd</sup> Report Monday 18<sup>th</sup> September
- 3<sup>rd</sup> Report Monday 16<sup>th</sup> October
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Each report should be 250 to 500 words in length.

Marks will be awarded for:

- Documented evidence, in your report, of your active participation in the simulation game
- Accuracy of your report of the discussions in the simulation game
- Evidence of a reflective approach to the technical discussions in the simulation game
- Evidence of reflection on the process of teamwork and learning through participation in the simulation game
- Awareness of the ethical implications of alternative choices available at different points in the game

### ***Real World Case Studies***

To assist in achieving Course Aims 1, 2, 3, 5, 7 and 8 you are required to write up a Case Study of a recent event (such as a takeover, a buy back, a demutualisation) that has actually happened that is relevant to taxation or corporate law aspects of the three major topics dealt with in this course. The Case Studies can either be based on events that are a matter of public record or can be based on matters that you have encountered in your working life that are not matters of public record.

The account of the Case Study should be not less than 2500 words in length. Students will also be required to present their Real World Case Study in class. Students should circulate a synopsis of their presentation of their Real World Case Study when making the presentation. Presentations should not exceed 5 to 10 minutes in length and should be in the form of an executive summary that highlights the key points from the Case Study.

Students should consult with the lecturers in the course prior to Monday 11 September to agree on the topic of their Real World Case Study. The due date for submission of Real World Case Studies is: **Tuesday 3<sup>rd</sup> October**

Student presentations of Real World Case Studies will take place in Weeks 12 and 13. Students will be advised by the Lecturer in Charge of the week in which they will be required to make their presentation.

Marks will be awarded for:

- The relevance of the Real World Case Study to issues dealt with in the course
- The technical accuracy of the student's account of the Real World Case Study
- Clarity of written and oral expression
- The adequacy of the student's response to questions by the lecturer and other students
- Discussion of the ethical issues associated with the strategies used by the participants in the Real World Case Study

Examples of Real World Case Studies from previous years will be placed on Moodle.

### **Final Examination**

The Final Examination will be a take home examination posted on Moodle on a date during the Final Examination period to be agreed with students. Normally the Final Exam will be posted on Moodle by 9am on a Friday morning and students will be expected to submit their responses via Turnitin by 5pm on the next Monday. There will be two problem type questions in the Final Examination. Marks will be awarded for technical accuracy and clarity of analysis and expression.

### **4.3 Assessment Format**

Information about the format of assignments in this course is contained on Moodle.

### **4.4 Assignment Submission Procedure**

All assignments should be submitted on Moodle by 10am on the due date for the assignment.

### **4.5 Late Submission and Penalties**

Assignments submitted after the due date will not be accepted without penalty unless prior approval has been granted by the lecturer. Assignments that are submitted late without prior approval will have 10% of the available marks deducted and (where applicable) no mark for presentation will be awarded if a student does not present on the designated date. If you foresee that you will have problems submitting an assignment on time you should contact the Lecturer by e-mail immediately, explaining the circumstances in full. No extensions will be granted after the due date itself.

If illness or misadventure prevents you from submitting an assignment on time you should make an application for special consideration.

#### **Quality Assurance**

The Business School is actively monitoring student learning and quality of the student experience in all its programs. A random selection of completed assessment tasks may be used for quality assurance, such as to determine the extent to which program learning goals are being achieved. The information is required for accreditation purposes, and aggregated findings will be used to inform changes aimed at improving the quality of Business School programs. All material used for such processes will be treated as confidential.

## **5 COURSE RESOURCES**

### **Texts:**

Students are required to have access to:

- a current edition of the *Corporations Act 2001*
- a current edition of the *Competition and Consumer Act 2010*
- a current edition of the *Income Tax Assessment Act 1936* and the *Income Tax Assessment Act 1997*

### **Background Reading:**

No one text adequately deals with the topics in this course. Reference to the following texts will provide useful background reading for the topics dealt with in the course outline. References to appropriate paragraphs of these texts will be found throughout the course outline. Students should read these references as background preparation for class discussions.

- Chapters 11 and 12 of Gilders, Taylor, Walpole, Burton and Ciro, *Understanding Taxation Law*, 10th edition, Lexis Nexis 2017
- Chapters 18 to 20 and 22 of Woellner, Barkoczy, Murphy and Evans, *Australian Taxation Law*, 27th edition, OUP, 2017.
- Hanrahan, Ramsay and Stapleton, *Commercial Applications of Company Law*, OUP, latest edition.
- Harris, Hargovan and Adams, *Australian Corporate Law*, latest edition, Lexis Nexis

Legislation and case law is constantly developing in this area. Updated references will be placed on Moodle throughout the course.

### **Additional Reading:**

The following texts discuss in some depth many of the topics dealt with in this course. Unfortunately, some of the texts are now several years old and only contain references to ITAA97. Students need not read these references prior to classes on the topic but should find reference to these texts to be useful follow-up reading to classes. Students should exercise care in using older texts as both the legislation and case law may have changed since the text was written. Reference should always be made to the latest version of the relevant Statute and to current commentaries to check the current position. Additional references and suggested readings may be placed on Moodle throughout the course.

- SJ Gates, *Tax Aspects of Corporate Restructuring*, LBC, 1996
- W Scholtz, *Australian Corporate Taxation*, Longman Business & Professional, 1995
- M Cashmere, *Tax And Corporate Financing: into the new millennium*, CCH, 1999
- HAJ Ford, R P Austin and I Ramsay, *Ford, Austin and Ramsay's Principles Of Corporations Law* (Available on line through Lexis Nexis (Australia) website via UNSW Library
- R Levy, *Takeovers: Law And Strategy*, Thomson Reuters, latest edition
- Baxt, Black and Hanrahan, *Securities and Financial Services Law*, Lexis Nexis, 8<sup>th</sup> edition, 2014.

Reference should also be made to commentary on relevant provisions in:

CCH *Australian Federal Tax Reporter* (available on-line through the UNSW Library Website)

ATP *Commentary ITAA 1997* (available on-line through the UNSW Library Website)

### **Internet Resources**

The following internet sites will be useful in this course:

ACCC: <http://www.accc.gov.au/business/mergers>

ASIC: <http://www.asic.gov.au>

ASX: <http://www.asx.com.au>

ATO: <http://www.ato.gov.au>

Australian Legal Information Institute: <http://www.austlii.edu.au>

Board of Taxation: <http://www.taxboard.gov.au>

Federal Register of Legislation: <https://www.legislation.gov.au/>

Treasurer: <http://www.treasurer.gov.au>

Treasury: <http://www.treasury.gov.au>

### **Electronic Databases:**

The UNSW library subscribes to several electronic databases. The UNSW library database can be accessed at: <https://www.library.unsw.edu.au/study/information-resources/databases>

Students can obtain free access to electronic databases relevant to this course via the UNSW Library Web Site. Some of the legal databases more relevant to this course are:

AGIS (the catalogue of the Federal Attorney General's Department Library)

CCH Library

First Point (Thomson Reuters)

Lexis Nexis (Australian version)

Checkpoint (Thomson Reuters)

### **MOODLE:**

Throughout the course materials will progressively be placed on Moodle. These materials will include case studies and notes on various topics dealt with in the course, additional references relevant to topics dealt with in the course and references to recent statutory and case law developments relevant to the course. Students should check Moodle regularly throughout the course.

The website for this course is on Moodle at: <https://moodle.telt.unsw.edu.au/login/index.php>

## **6 COURSE EVALUATION AND DEVELOPMENT**

Each year feedback is sought from students and other stakeholders about the courses offered in the School and continual improvements are made based on this feedback. UNSW's myExperience survey is one of the ways in which student evaluative feedback is gathered. In this course, we will seek your feedback through via end of semester myExperience responses and informal mid-course paper surveys. Feedback from previous students indicated that most students found the course interesting, challenging and engaging. Nonetheless a significant number of students indicated that: 1. More information was needed about assessments and marking criteria in the course; 2. The assessment workload was too great; and 3. The course content was detailed with long readings which were hard to cover in a 12 week semester.... As a result of this feedback the following changes have been made:

1. More detailed rubrics have been developed in relation to the Simulation Games and the Real World Case Study. These rubrics have been placed on the course Website.

2. Providing examples of Real World Case Studies from previous years on the course Website.
3. The word limit on the Simulation Game Reports have been reduced to 250-500 words per report.
4. The number of Simulation Game Reports has been reduced from 4 to 3.
5. The Course content has been reviewed with the result that some topics will be taught in less detail in 2017.

The School of Taxation & Business Law's quality enhancement process involves regular review of its courses and study materials by content and educational specialists, combined with feedback from students. Towards the end of the semester, you will be asked to complete an online myExperience survey via Moodle to evaluate the effectiveness of your course lecturer and the actual course content. Your input into this quality enhancement process through the completion of these surveys is extremely valuable in assisting us in meeting the needs of our students and in providing an effective and enriching learning experience. The results of all surveys are carefully considered and do lead to action towards enhance the quality or course content and delivery.

## 7 COURSE SCHEDULE

Week	Topic	Assessment Activities
Week 1 24 July	<i>Pamela Hanrahan</i> Provision of course information Overview of Business Structures in Australia	
Week 2 31 July	<i>Pamela Hanrahan</i> Corporate Decision Making and Corporate Governance	
Week 3 7 August	<i>John Taylor</i> Corporate Law Aspects of Fundraising	
Week 4 14 August	<i>John Taylor</i> Tax considerations in fund raising shares	1 <sup>st</sup> Simulation Game
Week 5 21 August	<i>John Taylor</i> Tax Aspects of Distributions and Capital Gains on shares	Report of 1 <sup>st</sup> Simulation Game due 21 August
Week 6 28 August	<i>Pamela Hanrahan</i> Transactions affecting share capital	
Week 7 4 September	<i>Pamela Hanrahan</i> Corporate Law Aspects Of Mergers And Acquisitions – including competition law	
Week 8 11 September	<i>John Taylor</i> Tax Consolidation and Value Shifting Provisions	2 <sup>nd</sup> Simulation Game
Week 9 18 September	<i>Pamela Hanrahan</i> Corporate Law Aspects of External Administration and Liquidations	Report of 2 <sup>nd</sup> Simulation Game due 19 <sup>th</sup> September
<b>Mid-session break 23/9 – 2/10 (Inclusive)</b> <b>Real World Case Study Due 3<sup>rd</sup> October</b>		
Week 10 2 October	Public Holiday – no class	
Week 11 9 October	<i>John Taylor</i> Tax Aspects Of Mergers And Demergers	3 <sup>rd</sup> Simulation Game
Week 12 16 October	<i>John Taylor</i> Real World Case Study Presentations	Report of 3 <sup>rd</sup> Simulation Game due 17 <sup>th</sup> October
Week 13 23 October	<i>John Taylor</i> Real World Case Study Presentations	