



Integrated Taxation Services

ITS M&E

Future Developments v20

CT1

Version	Form CT1 v19
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0 DOCUMENT INFORMATION

0.1 Synopsis

This document is intended for use by all support areas in Revenue to support the Maintenance and Enhancements planned future developments for Form CT1 v20. These releases are planned to follow the release of v19 in 2019. Any changes that are planned but **NOT** planned to release in v20 will be explicitly stated as such. This document can be used as a high-level requirements list for CT1 v20.

0.2 Change History

Table 1 - Change History

Version Number	Section Affected	Change Description	Changed by	Date	Reviewed by	Date
0.1		Created	Ryan Kane	04/04/2020		

0.3 Abbreviations & Terms Used in this Document

Table 3 – Common Abbreviations List

Abbreviation	Description
Common Abbreviations Used	Abbreviations Used

1 MAINTENANCE & ENHANCEMENTS

1.1 Future Developments

Every year a new version of the Form CT1 needs to be created in order to cater for the Finance Act changes made in the Budget for the coming year. Any planned future developments for v20 and beyond are documented here.

1.1.1 V20 requirements

SIR	Issue	Date Resolved
IN: 81650	Section 291A sub-panel: <ol style="list-style-type: none"> Leasing profits not itemised on the print view. Only showing in the Total Total only showing on calculate page, not listed as an income type 	

1.1.1.1 Accounting Period for 366 days.

SIR 73128 - Agents should not be allowed to file a CT1 for a 366-day period, even in a leap year, unless the accounting period includes the 29th February.

1.1.1.2 Monetary fields:

The validation in certain monetary fields to be increased to accept higher value of €999,999,999,999 [i.e. 15 as opposed to 12 characters].

1.1.1.3 Company Details – list of countries

Country of Saudi Arabia is incorrectly spelled in drop down menus in non-resident companies, groups, residency details, foreign incorporated companies. See below:

[Show Purchase of own shares by an...](#)

Groups

If company is a member of a group for Irish tax purposes enter details

[Hide Groups](#)

Details of Parent Company

Name of parent

Irish Tax Reference Number

Country of Residence of parent
(if no Irish Tax Reference
Number available)


Subsidiaries

To Enter or Edit Details for Subsidiaries
please click the Subsidiaries button

Group Relief

Only complete this section if each
company has all the qualification
entitlement as set out in Section
418 TCA 1997 inclusive

Papua New Guinea
Paraguay
Peru
Philippines
Pitcairn
Poland
Portugal
Puerto Rico
Qatar
Reunion
Romania
Russian Federation
Rwanda
Saint Kitts and Nevis
Saint Lucia
Saint Vincent and the Grenadines
Samoa
San Marino
Sao Tome and Principe
Sark
Saudi Arabia
Senegal
Seychelles
Sierra Leone
Singapore
Slovakia (Slovak Republic)



The following countries also need to be added to the list:

- Isle of Man
- Kosovo
- Serbia

1.1.1.4 Other Codes Panel – ITP: New section for Miscellaneous income, repayable credits, and non-repayable credits.

Add new questions to the Miscellaneous income section to the Other Codes panel.

Text to appear on screen	Information entered [and notes]
Miscellaneous Income	monetary field 0 – 99,999,999,999
Description [Note: Description entered here will appear on the Notice of Assessment]	Text field – 35 characters. [This description will be output on the Notice of Assessment].
Rate of charge	12.5% or 25% [tax will be charged at whichever rate is selected by the caseworker]
Can deductions, allowances, etc. be offset against this income	Yes / No [If yes is selected, deductions, etc. will be offset against the income assessed. If no is selected, no deductions will be offset against this income.]

A mock-up of how this would appear in the ITP input screen is shown below – the new text is in red.

Miscellaneous Income

Miscellaneous Chargeable Amount

€

Description

Note: The description entered will appear on the Notice of Assessment

Miscellaneous Income

€

Description

Note: The description entered will appear on the Notice of Assessment

Rate of charge

12.5%

☐

25%

☐

Can deductions, allowances, etc. be offset against this income

Yes

☐

No

☐

Add

Miscellaneous Credits (repayable and non-repayable)

Two new financial fields required in the other codes panel as follows:

- Miscellaneous Repayable Credit
- Miscellaneous non-repayable credit

Each will have its own description field.

Text to appear on screen

Miscellaneous repayable credit

Description

[Note: Description entered here will appear on the Notice of Assessment]

Miscellaneous non-repayable credit

Description

[Note: Description entered here will appear on the Notice of Assessment]

Information entered [and notes]

monetary field 0 – 99,999,999,999

Text field – 35 characters. [This description will be output on the Notice of Assessment].

monetary field 0 – 99,999,999,999

Text field – 120 characters. [This description will be output on the Notice of Assessment].

These are to appear after the new Miscellaneous income section above.

CCE:

Miscellaneous repayable credit. This should behave in the same manner as Amount of Professional Services Withholding Tax

Miscellaneous non-repayable credit. This should behave in the same manner as Double Taxation Relief.

Calculate		Taxable Income after Deductions	
Property Based Incentives		Taxable Income	2000
✓ CT Self Assessment		Corporation Tax @ 25 %	2000 @ 25 % = 500.00
CGT Self Assessment		Total	500.00
Print View			
		Reliefs - Amounts Allowed	
		Double Taxation Relief	500.00
		Total Reliefs	500.00
		Total Credits - Amounts Allowed	
		Gross Withholding Tax	4500
		Total Credits	4500
		Payable under deduction of Tax - Amounts Allowed	
		Controlled Foreign Company charge	0.00
		Total Repayable	4500.00

Double Taxation Relief (excluding relief claimed under Additional Foreign Credit below) € 2200

(c) Amount of Professional Services Withholding Tax retained under Sec.527 (3)(a) € 4500

1.1.1.5 Capital Gains (other than on land with Development Value):

The field at (d) is to be relabelled and split into two fields as follows:

(d) Charge to Exit Tax under S6027 – enter amount of net chargeable gains

(i) liable at 12.5%

0 – 999,999,999,999

(ii) Liable at 33%

0 – 999,999,999,999

A mock-up of this change is shown below; new text in red:

(b) Amount of Net Chargeable Gain at 40% (Enter the amount of the gain and not the amount of the tax payable)	€	<input type="text"/>
(c) Amount of Net Chargeable Gain in respect of Venture Fund Capital (Section 541C(3)(b) TCA 1997) (Enter the amount of the gain and not the amount of the tax payable)	€	<input type="text"/>
(d) Charge to Exit Tax under S 627		
– enter amount of net chargeable gains		
(i) liable at 12.5%	€	<input type="text"/>
(ii) Liable at 33%	€	<input type="text"/>
Enter the amount of relevant tax being deferred under Sec 629(2)		
Please note: If you made an election under S 629 (2) the amount to be entered here should be 5/6th of the relevant tax.	€	<input type="text"/>
		<input type="button" value="Clear"/> <input type="button" value="Next"/>

CCE

The amount at (i) is the existing field (d), i.e. it is liable at 12.5%.

The amount at (ii) is liable at 33%.

In the computation the two field are shown as Capital Gains in panel 1 but are displayed separately when the tax charged is shown. For example, if (i) had 1,000 and (ii) had 5,000, the display in the computation would be as follows:

Calculate		
✓ Company Details	Company Tax Reference Number	1234567t
Trading Results		
Extracts from Accounts	Company Name	aCME ltd
Irish Rental Income	Date	30/12/2019
Irish Investment & Other Income		
Foreign Income		
Exempt Profits	Currency	All Amounts in Euro
✓ Capital Gains	Corporation Tax for Accounting Period	From 01/01/2019 To 10/10/2019
Chargeable Assets		
Deductions, Reliefs & Credits		
Research & Development Credit		
Film Corporation Tax Credit		
Capital Gains (Development Land)		
Close Company Surcharge		
Recovery of Income Tax		
Dividend Withholding Tax		
Calculate		
Property Based Incentives		
✓ CT Self Assessment		
CGT Self Assessment		
Print View		
Assessment to Corporation Tax - Amounts Assessable		
	Capital Gains	6000
	Total Income	6000
Taxable Income after Deductions		
	Taxable Income	1000
	Tax on Chargeable gain @ 12.5 %	1000 @ 12.5 % = 125.00
	Tax on Chargeable gain @ 33%	5000 @ 33% = 1650.00
	Total	1775.00
Payable under deduction of Tax - Amounts Allowed		

Clarification re validation:

The two field are independent of the validation shown in red below:

Unused Loss/es from prior accounting period(s) available for offset against these gains.	€	
To Automatically calculate the value of Net Chargeable Gain in this accounting period, click the Net Chargeable Gain		Net Chargeable Gain
(a) Net Chargeable Gain	€	
The value that has been entered in this field must be equal to the sum of (a), (b), (c) and (d) below.		
(b) If any amount at (a) refers to a disposal of emissions allowances under Section 540A TCA 1997, enter that amount here.	€	
Unused Losses for carry forward to future accounting periods	€	
(a) Amount of Net Chargeable Gain at 33% (Enter the amount of the gain and not the amount of the tax payable)	€	
(b) Amount of Net Chargeable Gain at 40% (Enter the amount of the gain and not the amount of the tax payable)	€	
(c) Amount of Net Chargeable Gain in respect of Venture Fund Capital (Section 541C(3)(b) TCA 1997) (Enter the amount of the gain and not the amount of the tax payable)	€	
(d) Charge to Exit Tax under S6027 – enter amount of net chargeable gains		
(i) liable at 12.5%	€	1000
(ii) liable at 33%	€	5000
Enter the amount of relevant tax being deferred under Sec 629(2) Please note: If you made an election under S 629 (2) the amount to be entered here should be 5/6th of the relevant tax.	€	

There can be an entry in either one of these two fields with no other entries in the Capital Gains panel.

1.1.1.6 Dividend Withholding Tax

Increase amount of entries from 40 to 100 for details of distributions. See screenshot below.

Details of Distributions

Dividend Withholding Tax - Details of Distributions

Details of Distribution - 1

Date of Distribution (dd/mm/yyyy)

Gross Value of Distribution

€

Value of DWT deducted, if any

€

Click on the 'Add Distribution' button to add a Distribution. You may add up to a maximum of 40 Distributions.

Add Distribution

Please click on the D.W.T. button to return to the Dividend Withholding Tax panel

Back to D.W.T.


Clear

1.1.1.7 Leasing Profits

A new section, with one question, is required:

Subheading	Leasing profits
Text	Profits arising from non-trading leasing activity
Validation	0 – 999,999,999,999
CCE	This income is liable at 25%

A mock-up of this section is shown in the screenshot below.

Irish Investment Income and Other Irish Income	
<ul style="list-style-type: none"> ✓ Company Details Trading Results Extracts from Accounts Irish Rental Income Irish Investment & Other Income Foreign Income Exempt Profits Capital Gains Chargeable Assets Deductions, Reliefs & Credits Research & Development Credit Film Corporation Tax Credit Capital Gains (Development Land) Close Company Surcharge Recovery of Income Tax Dividend Withholding Tax Calculate Property Based Incentives CT Self Assessment CGT Self Assessment Print View 	<div>Form Help </div> <div>Interest arising in the State</div> <p><i>Ensure that the appropriate credit is entered in the Credits section of the Deductions, Reliefs and Credits Panel</i></p> <p>Gross Interest received or credited (under deduction of Irish tax) € <input type="text"/></p> <p>Gross Interest received or credited (without deduction of Irish tax) € <input type="text"/></p> <div>Leasing Profits</div> <p>Profits arising from non-trading leasing activity € <input type="text"/></p> <div>Other Irish Income</div> <p><i>Where credit is due, ensure that the appropriate credit is entered in the Credits section of the Deductions, Reliefs and Credits Panel</i></p> <p>(a) Patent Royalty Income received under deduction of Irish tax € <input type="text"/></p>

1.1.1.8 Associated Companies

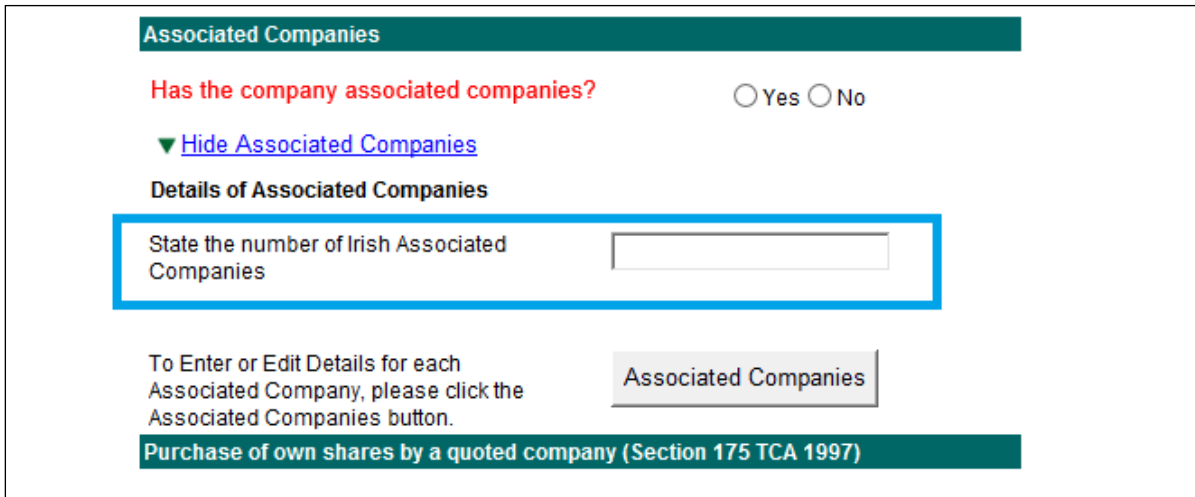
Replace existing text “If company has associated companies enter details” with the following mandatory question:

Has the company associated companies?

This is a yes / no tick-box.

Where the answer is yes the question in blue is mandatory and details of at least one associated company must be completed in the Associated Companies sub-panel.

A mock-up of the changes is shown below:



1.1.1.9 Transfer Pricing

A new subheading and three new questions required for the Company details panel, to appear before the Controlled Foreign Company. All three questions are mandatory

Transfer pricing

Text	Does the company qualify for the SME exemption under section 835EA?	Yes / No Tick-boxes
Validation	Is the company required to prepare a Local File, tick the box	Yes / No Tick-boxes
CCE	Is the company required to prepare a Master File, tick the box	Yes / No Tick-boxes

All three questions are mandatory

All are non-financial fields; they have no effect on the CCE.

A mock-up of this section is shown in the following screenshot – new text in red.

Transactions with jurisdictions now considered to be non-cooperative for tax purposes

During the accounting period, did you enter into a transaction of paying royalty, interest or dividends to a person in any jurisdiction which is currently considered by the EU Member States collectively as a non-cooperative jurisdiction for tax purposes?

☐ Yes ☐ No

Transfer pricing

Where the company qualifies for the **SME exemption** under section 835E, tick the box

☐ Yes ☐ No

Where the company is required to prepare a **Local File**, tick the box

☐ Yes ☐ No

Where the company is required to prepare a **Master File**, tick the box

☐ Yes ☐ No

Controlled Foreign Company

Is this company a chargeable company under the provision of Part 35B

☐ Yes ☐ No

1.1.1.10 Mandatory disclosures

One new field required:

Reportable cross-border arrangement reference number.

This is a text box 0 – 25 characters.

An add field should allow the addition of nineteen additional reference numbers, i.e. 20 in total.

In addition, the existing field “the number assigned to a transaction...section 817HB” should allow for an additional 19 such field (total 20) via a new Add S 817HB transaction number.

A mock-up of the changes is shown in the screenshot below.

Proposed layout as shown in screenshot below is fine.

* Denotes a required field

Mandatory Disclosure		
S817HB Transaction number	1111	remove
S817HB Transaction number	1234567	remove
The number assigned to a transaction by the Revenue Commissioners under section 817HB		<input type="text"/>
<input type="button" value="Add S817HB Transaction number"/>		
cross-border arrangement reference number	aaaaaa	remove
cross-border arrangement reference number	1234567T	remove
Reportable cross-border arrangement reference number		<input type="text"/>
<input type="button" value="Add cross-border arrangement reference number"/>		
Election under Sec. 629 (2)		

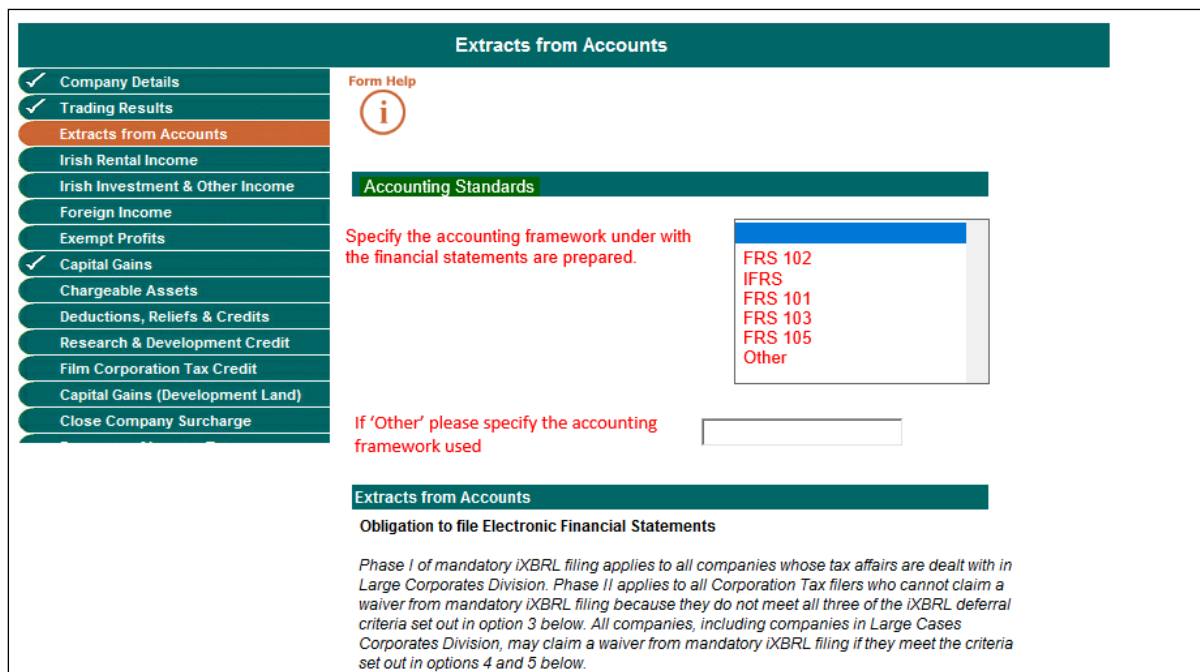
1.1.1.11 Accounting Standards

A new section is required at the start of the Extracts from Accounts section.

This consists of a sub-heading in a green banner, a question with a drop-down box, providing for six options, the last option being 'other'. There is a second question, which is a text box, which is to be mandatory if 'other' is selected from the first question

Accounting Standards	Sub-heading in green banner
Specify the accounting framework under with the financial statements are prepared	Drop down box with six options: <ul style="list-style-type: none"> • FRS 102 • IFRS • FRS 101 • FRS 103 • FRS 105 • Other
If 'Other' please specify the accounting framework used	Text box; up to 40 characters

A mock-up of this new section is shown in the screen-shot below:



Validation:

1. The first question is mandatory if there is any entry in the Trading Results panel.
2. The second question is mandatory if 'other' selected in the first question.

1.1.1.12 Company Registration Office number



Insert the following new question after the company name in the Company Details panel:

Company Registration Office number

Numeric field, up to six characters

This should be pre-populated from the previous year's return. However, as this is the first year we're asking for this information it will only become pre-populated in subsequent accounting periods.

This is not mandatory for 2020 (we may review this in future years).

Company Details		
✓ Company Details	Form Help	What's New
Trading Results		
Extracts from Accounts		
Irish Rental Income		
Irish Investment & Other Income		
Foreign Income		
Exempt Profits	* Denotes a required field	
Capital Gains	* Tax Reference Number	<input type="text" value="1234567T"/>
Chargeable Assets		
Deductions, Reliefs & Credits	* Name of Company	<input type="text" value="ACME Ltd"/>
Research & Development Credit		
Film Corporation Tax Credit		
Capital Gains (Development Land)	* Company Registration Office number	<input type="text"/>
Close Company Surcharge		
Recovery of Income Tax		
Dividend Withholding Tax		
Calculate		
Property Based Incentives		
CT Self Assessment		
CT Self Assessment		
	Mandatory Disclosure	
	The number assigned to a transaction by the Revenue Commissioners under section 817HB	<input type="text"/>

1.1.1.13 Accounting period start date

In a pre-populated return:

- Show the following line above the 'from' date:
Your most recent field return was for the period [from date from most recent return] to [To date from most recent return].
- Pre-populate the "From" date with the next day after the previous accounts, i.e. the 'To' date of the previous return plus one day.

Rules when this date should be pre-populated:

- We pre-populate the start [from] date where we hold a return for a period ending either in the same or the previous calendar year.
- This field remains editable in all situations, whether it has been populated or not.
- We do not prevent a return being filed with a different date (e.g. the customer files a non-prepopulated return).

An example is shown below. The customer is opening a return for the period 01/01/2020 to 31/12/2020 and there is a CT1 on record for the period 1 April 2018 to 31 March 2019.

CT Self Assessment CGT Self Assessment Print View	629(2) please tick the box and provide the requested information.
Return of Profits, Chargeable Gains, Chargeable Assets Acquired and Other Particulars for the Accounting Period Indicated Hereunder	
* State Company Accounting Period	
Your most recent filed return was for the period 01/04/2018 to 31/03/2019	
* From (dd/mm/yyyy)	<input type="text" value="01/04/2019"/>
* To (dd/mm/yyyy)	<input type="text"/>
Does this return contain values in excess of one billion euro <input type="radio"/> Yes <input type="radio"/> No	

1.1.1.14 Change Accounting Periods

1.1.1.14.1.1 Improve Communication

Selecting period

CT1 Period Select
ACME 4-3600173HH

Step 1:
 To begin filing select your account period below and click Next

Form Data Payment Details Sign & Submit Acknowledgement

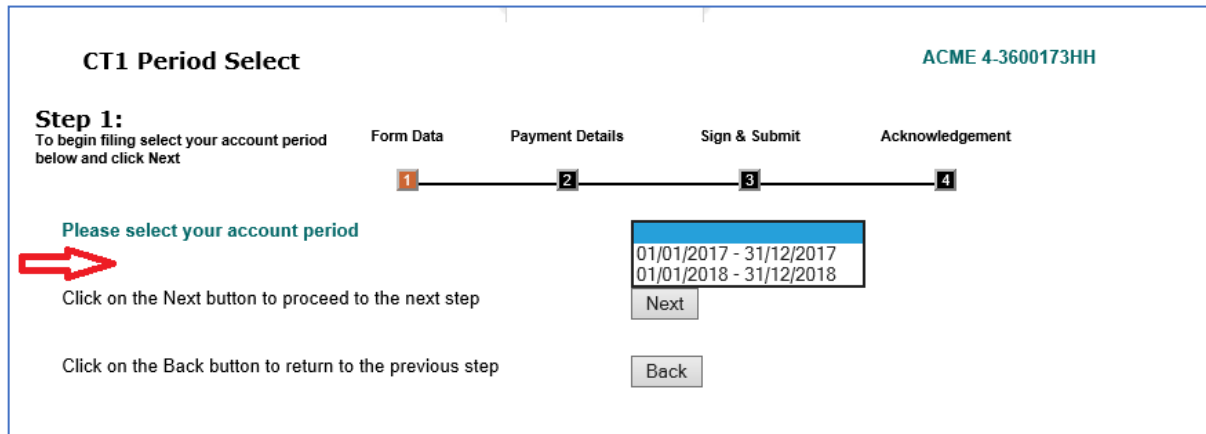
1 — 2 — 3 — 4

Please select your account period

Click on the Next button to proceed to the next step

Click on the Back button to return to the previous step

Figure 1: Image when screen opens



CT1 Period Select ACME 4-3600173HH

Step 1:
To begin filing select your account period below and click Next

Form Data Payment Details Sign & Submit Acknowledgement

1 — 2 — 3 — 4

Please select your account period

Click on the Next button to proceed to the next step

Click on the Back button to return to the previous step

01/01/2017 - 31/12/2017
01/01/2018 - 31/12/2018

Next

Back

Figure 2: Image showing periods available.

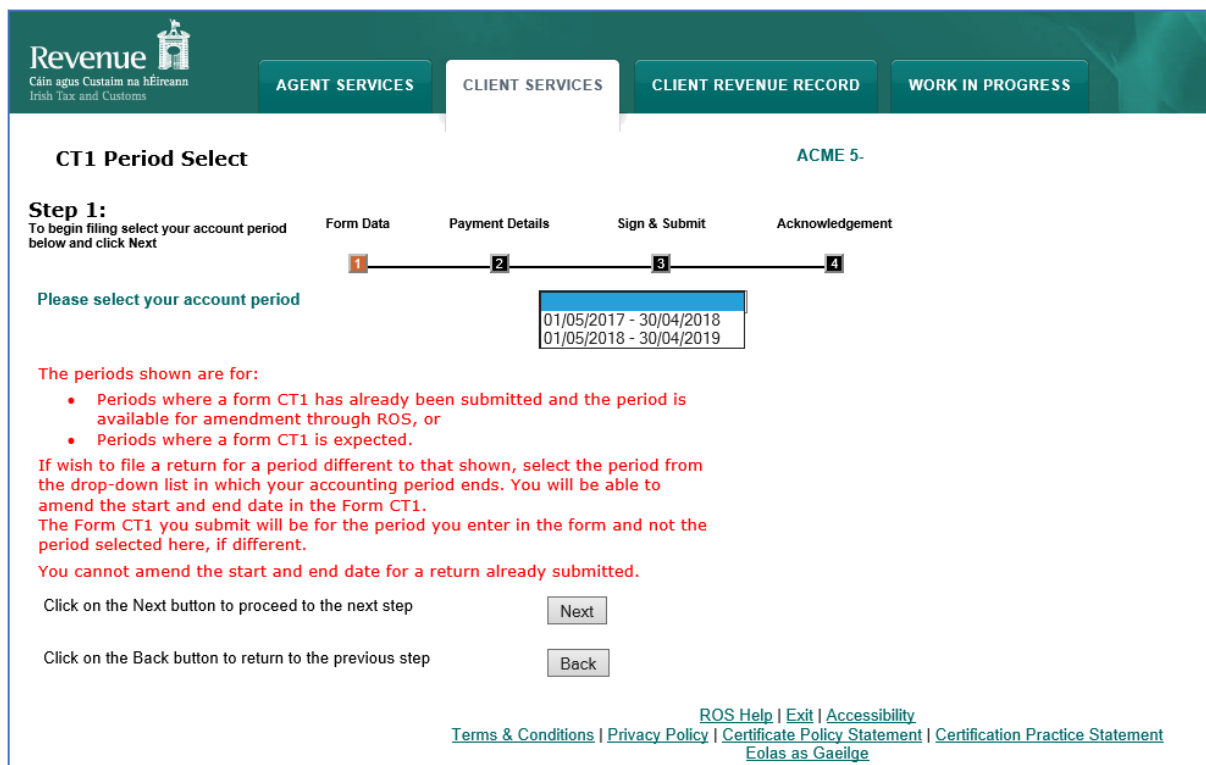
Insert the following text where indicated by the red arrow:

The periods shown are for:

- Periods where a form CT1 has already been submitted and the period is available for amendment through ROS, or
- Periods where a form CT1 is expected.

If you wish to file a return for a period different to that shown, select the period from the drop-down list in which your accounting period ends. You will be able to amend the start and end date in the Form CT1. The Form CT1 you submit will be for the period you enter in the form and not the period selected here, if different.

You cannot amend the start and end date for a return already submitted.



Revenue
Cáin agus Custaim na hÉireann
Irish Tax and Customs

AGENT SERVICES CLIENT SERVICES CLIENT REVENUE RECORD WORK IN PROGRESS

CT1 Period Select ACME 5-

Step 1:
To begin filing select your account period below and click Next

Form Data Payment Details Sign & Submit Acknowledgement

1 — 2 — 3 — 4

Please select your account period

The periods shown are for:

- Periods where a form CT1 has already been submitted and the period is available for amendment through ROS, or
- Periods where a form CT1 is expected.

If wish to file a return for a period different to that shown, select the period from the drop-down list in which your accounting period ends. You will be able to amend the start and end date in the Form CT1.
The Form CT1 you submit will be for the period you enter in the form and not the period selected here, if different.

You cannot amend the start and end date for a return already submitted.

Click on the Next button to proceed to the next step

Click on the Back button to return to the previous step

01/05/2017 - 30/04/2018
01/05/2018 - 30/04/2019

Next

Back

[ROS Help](#) | [Exit](#) | [Accessibility](#)
[Terms & Conditions](#) | [Privacy Policy](#) | [Certificate Policy Statement](#) | [Certification Practice Statement](#)
 Eolas as Gaeilge

Figure 3: Mock-up of new text at period select page in ROS Online

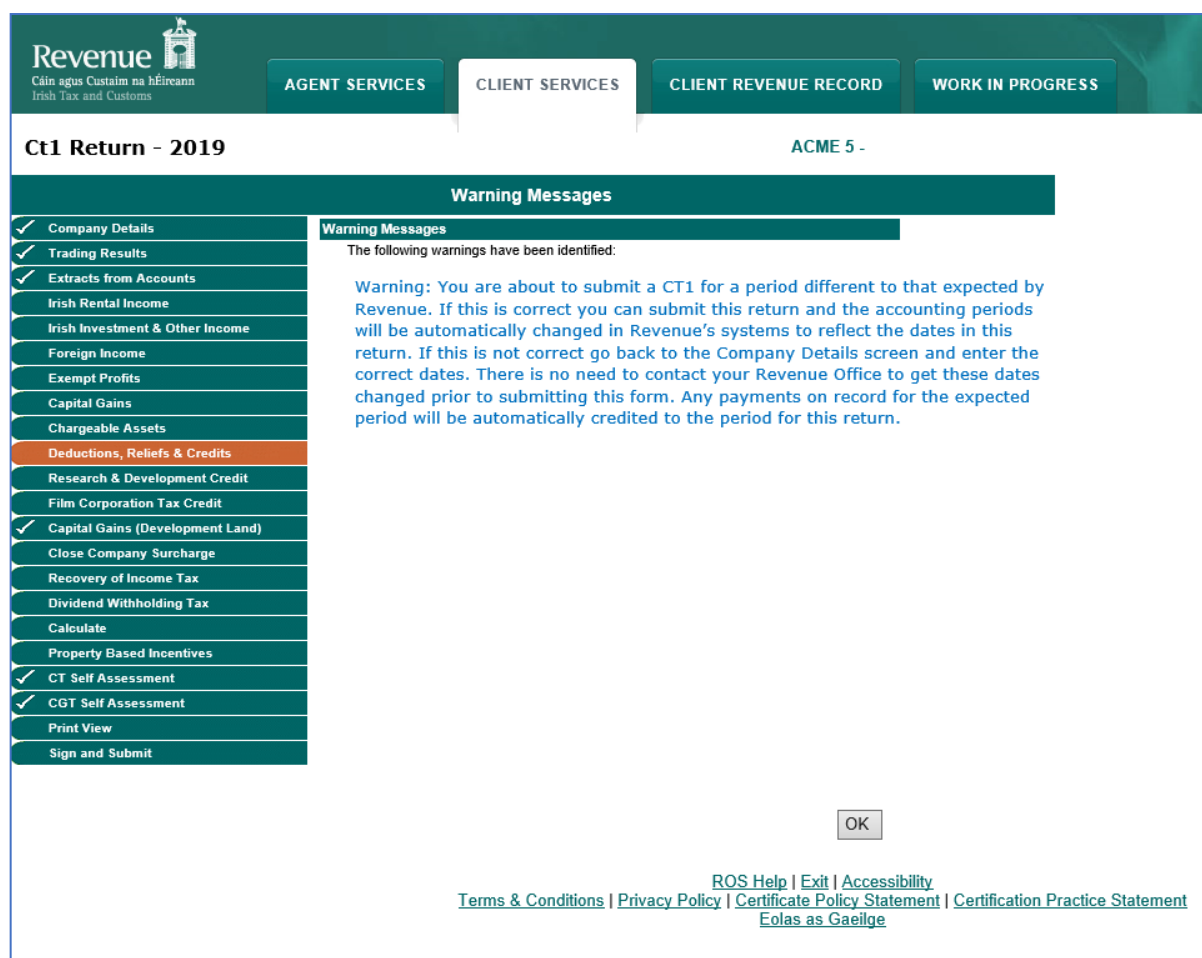
1.1.1.14.1.2 Submitting return

Warning message

Where a user attempts to upload a Form CT1 for a period different to that expected, the following warning message should be present to the filer:

Warning

You are about to submit a CT1 for a period different to that expected by Revenue. If this is correct you can submit this return and the accounting periods will be automatically changed in Revenue's systems to reflect the dates in this return. If this is not correct go back to the Company Details screen and enter the correct dates. There is no need to contact your Revenue Office to get these dates changed prior to submitting this form. Any payments on record for the expected period will be automatically credited to the period for this return.



The mock-up shows a web interface for Revenue's Integrated Taxation Services. The top navigation bar includes 'AGENT SERVICES', 'CLIENT SERVICES', 'CLIENT REVENUE RECORD', and 'WORK IN PROGRESS'. The main header displays 'Ct1 Return - 2019' and 'ACME 5 -'. A 'Warning Messages' section is highlighted, containing a list of return components on the left and a warning message on the right. The warning message states: 'Warning: You are about to submit a CT1 for a period different to that expected by Revenue. If this is correct you can submit this return and the accounting periods will be automatically changed in Revenue's systems to reflect the dates in this return. If this is not correct go back to the Company Details screen and enter the correct dates. There is no need to contact your Revenue Office to get these dates changed prior to submitting this form. Any payments on record for the expected period will be automatically credited to the period for this return.' Below the warning message is an 'OK' button. At the bottom, there are links for 'ROS Help | Exit | Accessibility', 'Terms & Conditions | Privacy Policy | Certificate Policy Statement | Certification Practice Statement', and 'Eolas as Gaeilge'.

Figure 4: Mock-up of new warning message when saving or submitting return

1.1.1.14.1.3 Existing Work-items

Where a return is submitted with different start and/or end dates to that in ITP, but there is no overlapping period (with a form CT1 or 46G, or iXBRL financial statements already filed), ITP should update to the new accounting period automatically and no work-item should be created.

Any tax paid in the existing ITP period(s) which overlap with this new period should be credited to the new period (i.e. no change to existing rules with regard to payments).

1.1.1.15 Hybrid Mismatches

A new section is required after 'distributions received from companies' resident in the State, in the *Irish Investment & Other Income* panel.

Line number	Label	Entry field	Notes:
	Hybrid Mismatches		Green subheading
1	Is an adjustment required under the anti-hybrid provisions of Part 35C	[Tick-box]	Validation; if box is ticked, then the hybrid mismatch section must be complete – at least one of the boxes in 2 must be completed and 3 must be completed.
	Show[/Hide] Hybrid Mismatch		Show Hide functionality. Automatically open if 1 ticked.
2	In calculating the company's taxable profits, the mismatch outcome is:		text
2(a)	Double deduction mismatch outcome neutralised under		Text
2(a)(i)	Section 835AD(2)(a) (Where the State is the investor territory, the amount denied)	Monetary field:	0 – 999,999,999,999
2(a)(ii)	section 835AD(2)(b) (Where the State is the payer territory, the amount denied)	Monetary field:	0 – 999,999,999,999
2(b)	Permanent Establishment deduction without inclusion mismatch outcome neutralised under		Text
2(b)(i)	Section 835AG(3)(a) (Where the State is the payer territory, the amount denied)	Monetary field:	0 – 999,999,999,999

2(b)(ii)	Section 835AG(3)(b) (Where the State is the payee territory the amount charged to tax)	Monetary field:	0 – 999,999,999,999 Financial Field: taxable at 25%. Deductions and credits can be offset against this amount.
2(c)	Financial instrument deduction without inclusion mismatch outcome neutralised under		Text
2(c)(i)	Section 835AJ(2)(a) (Where the State is the payer territory, the amount denied)	Monetary field:	0 – 999,999,999,999
2(c)(ii)	Section 835AJ (2)(b) (Where the State is the payee territory)		Text
2(c)(ii)(A)	Section 835AJ(2)(b)(ii)(I)		
2(c)(ii)(A)(I)	Details of provision disapplied	Text box	0 – 200 characters: This field is mandatory if an entry in 2(c)(ii)(A)(II).
2(c)(ii)(A)(II)	Amount	Monetary field:	0 – 999,999,999,999 This field is mandatory if an entry in 2(c)(ii)(A)(I).
2(c)(ii)(B)	Section 835AJ (2)(b)(ii)(II) (the amount charged to tax)	Monetary field:	0 – 999,999,999,999 Financial field: taxable at 25%. Deductions and credits can be offset against this amount.
2(d)	Payment to hybrid entity deduction without inclusion mismatch outcome neutralised under		Text

2(d)(i)	Section 835AL(2) (Where the State is the payer territory, the amount denied)	Monetary field:	0 – 999,999,999,999
2(e)	Payment by hybrid entity deduction without inclusion mismatch outcome neutralised under		text
2(e)(i)	Section 835AM(3)(a) (Where the State is the payer territory, the amount denied)	Monetary field:	0 – 999,999,999,999
2(e)(ii)	Section 835AM (3)(b) (Where the State is the payee territory)		text
2(e)(ii)(A)	Section 835AM(3)(b)(ii)(I)		Text
2(e)(ii)(A)(I)	Provision disappplied	Text box	0 – 200 characters: This field is mandatory if an entry in 2(d)(ii)(A)(II).
2(e)(ii)(A)(II)	Amount	Monetary field:	0 – 999,999,999,999 This field is mandatory if there is an entry in 2(e)(ii)(A)(I).
2(e)(ii)(B)	Section 835AM (3)(b)(ii)(II) (the amount charged to tax)	Monetary field:	0 – 999,999,999,999 Financial field: taxable at 25%. Deductions and credits can be offset against this amount.
2(f)	Withholding tax mismatch outcome neutralised under section 835AO(2) (The amount by which withholding tax is reduced)	Monetary field:	0 – 999,999,999,999

2(g)	Tax residency double deduction mismatch outcome neutralised under Section 835(AQ)(2), the amount denied	Monetary field:	0 – 999,999,999,999
2(h)	Imported mismatch outcome neutralised under section 835AS(2), the amount denied	Monetary field:	0 – 999,999,999,999
2(i)	Structured arrangement mismatch outcome neutralised under section 835AU(2), the amount denied	Monetary field:	0 – 999,999,999,999
3	Amount carried forward under section 835AV	Monetary field:	0 – 999,999,999,999 This field is mandatory if question one is ticked positive.

A mock-up of this section is shown below.

Distributions received from companies resident in the State

(a) Distributions received from a REIT €

Where credit for DWT is due, ensure that the appropriate credit is entered in the Credits section of the Deductions, Reliefs and Credits Panel

(b) All other distributions received (Excluding distributions from the Exempt Profits Panel) €

Hybrid Mismatches

1 Is an adjustment required under the anti-hybrid provisions of Part 35C ☐

[Show Hybrid Mismatches](#)

Clear
Next

Hybrid Mismatches

1 Is an adjustment required under the anti-hybrid provisions of Part 35C ☐

[Hide Hybrid Mismatches](#)

2 In calculating the company's taxable profits the mismatch outcome is:

2(a) Double deduction mismatch outcome neutralised under:

2(a)(i) Section 835AD(2)(a) (Where the State is the investor territory, the amount denied) €

2(a)(ii) section 835AD(2)(b) (Where the State is the payer territory, the amount denied) €

2(b) Permanent Establishment deduction without inclusion mismatch outcome neutralised under

2(b)(i) Section 835AG(3)(a) (Where the State is the payer territory, the amount denied) €

2(b)(ii) Section 835AG(3)(b)
 (Where the State is the payee
 territory the amount charged to
 tax)

€

2(c) Financial instrument deduction
 without inclusion mismatch
 outcome neutralised under

2(c)(i) Section 835AJ(2)(a)
 (Where the State is the payer
 territory, the amount denied)

€

2(c)(ii) Section 835AJ (2)(b)
 (Where the state is the payee
 territory)

2(c)(ii)(A) Section 835AJ(2)(b)(ii)(i)

2(c)(ii)(A)(I) Details of provision
 disapplied

2(c)(ii)(A)(II) Amount

€

2(c)(ii)(B) Section 835AJ (2)(b)(ii)(II)
 (the amount charged to
 tax)

€

2(d) Payment to hybrid entity deduction
without inclusion mismatch
outcome neutralised under

2(d)(i) Section 835AL(2)
(Where the State is the payer
territory, the amount denied)

€

2(e) Payment by hybrid entity deduction
without inclusion mismatch
outcome neutralised under

2(e)(i) Section 835AM(3)(a)
(Where the State is the payer
territory, the amount denied)

€

2(e)(ii) Section 835AM(3)(b)
(Where the State is the payee
territory)

2(e)(ii)(A) section 835AM (3)(b)(ii)(I)

2(e)(ii)(A)(I) Details of provision
disapplied

2(e)(ii)(A)(II) Amount

€

2(e)(ii)(B) Section 835AM (3)(b)(ii)(II)
(the amount charged to tax)

€

2(f)	Withholding tax mismatch outcome neutralised under section 835AO(2) (The amount by which withholding tax is reduced)	€ <input type="text"/>
2(g)	Tax residency double deduction mismatch outcome neutralised under Section 835AQ(2), the amount denied	€ <input type="text"/>
2(h)	Imported mismatch outcome neutralised under section 835AS(2), the amount denied	€ <input type="text"/>
2(i)	Structured arrangement mismatch outcome neutralised under section 835AU(2), the amount denied	€ <input type="text"/>
3	Amount carried forward under section 835AV	€ <input type="text"/>

CCE

The three fields in yellow highlight above are financial fields used by the CCE.

All deductions and credits can be offset against this income, i.e. the income should be treated in the same way as "Gross Interest received or credited (without deduction of Irish tax)" [existing income source already in this panel].

Display in the Calculation and Notice of Assessment

The assessing fields will output with the labels:

- Hybrid Mismatch – Section 835AG(3)(b)
- Hybrid Mismatch – Section 835AJ(2)(b)(ii)(II)
- Hybrid Mismatch – Section 835AM(3)(b)(ii)(II)

A mock-up of the Notice of Assessment is shown below:

Reference No.: 3625597FH

Pat Murphy
District Manager

10 February 2020

JAEGER 4

Page 4 of 4

NOTICE OF ASSESSMENT
FOR THE ACCOUNTING PERIOD FROM 01/01/2018 TO 31/12/2018

Panel 1: ASSESSMENT TO CORPORATION TAX		€
Hybrid Mismatch – Section 835AG(3)(b)		50,000
Hybrid Mismatch – Section 835AJ(2)(b)(ii)(II)		30,000
Hybrid Mismatch – Section 835AM(3)(b)(ii)(II)		66,000
TOTAL		146,000

Panel 2: DEDUCTIONS		€

1.1.1.16 Stock Borrowing and Repurchase Agreements

A new section is required in the Company Details panel to sit just above the Close Companies section.

Label	Entry field	Notes:
Stock Borrowing and Repurchase Agreements		Green subheading
Has the company acted as the stock seller of a financial transaction (within the meaning of section 753A):		Text
(i) in the course of its trade	Yes / No tick boxes	Yes / No tick-boxes; mandatory question
(ii) Otherwise than in the course of its trade	Yes / No tick boxes	Yes / No tick-boxes; mandatory question
Has the company acted as the stock buyer of a financial transaction (within the meaning of section 753A):		Text
(i) in the course of its trade	Yes / No tick boxes	Yes / No tick-boxes; mandatory question

(ii)	Otherwise than in the course of its trade	Yes / No tick boxes	Yes / No tick-boxes; mandatory question
------	---	------------------------	--

Validation:

The answers to the four questions are mandatory; all must be answered before the user can move out of this panel.

There is no interaction amongst these four questions; all can be yes, no, or a mixture.

CCE

No change is required to the CCE. All four questions are informational only.

Display in the calculation and Notice of Assessment:

The display in the print view of each of these four questions should read (space permitting):

- Company acted as a stock seller of a financial transaction in the course of its trade
- Company acted as a stock seller of a financial transaction otherwise than in course of its trade
- Company acted as a stock buyer of a financial transaction in the course of its trade
- Company acted as a stock buyer of a financial transaction otherwise than in course of its trade

With yes or no depending on their answer.

Mock-up:

To enter or edit details for each Controlled Foreign Company please click on the CFC button.

CFC

Stock Borrowing and Repurchase Agreements

Has the company acted as the stock seller of a financial transaction (within the meaning of section 753A):

(i) in the course of its trade

☐ Yes ☐ No

(ii) otherwise than in the course of its trade

☐ Yes ☐ No

Has the company acted as the stock buyer of a financial transaction (within the meaning of section 753A):

(i) in the course of its trade

☐ Yes ☐ No

(ii) otherwise than in the course of its trade

☐ Yes ☐ No

Close Companies only: Shareholders and other Participators

If company is a close company enter details

1.1.1.17 Clawback in respect of Research & Development activities (Irish Investment & Other Income panel)

Clawback in respect of Research & Development activities	
Amount taxable Case IV Sch.D (Sec. 766 (7B)(c)(i), Sec. 766(7C)(b) or Sec.766(7C) (c))	€ <input type="text"/>
Amount taxable Case IV Sch. D (Sec. 766 (7B)(c)(ii))	€ <input type="text"/>
Amount taxable Case IV Sch. D (Sec. 766A (3)(c)(ii))	€ <input type="text"/>
Unauthorised Amount Chargeable under Section 481(3A)(c)	

1.1.1.18 CCE Change

No deductions, expenses, allowances or non-refundable credits can be offset against any of the above three amounts for accounting period ending in 2020.[A change in FB 2019 is that now an amount charged under any of the above three fields will no longer be allowed to have any loss, deficit, expense, allowance or credit set against it].

The amount charged to Case IV here should also not encounter a close company surcharge.

Tax chargeable at 25%.

1.1.1.19 Section 291A

A change to the approach is required. The Section 291A section is to be removed into a sub-panel and to become informational only. All section 291A questions will therefore not impact the CCE.


The introductory text for this section is amended – the phrase “or a claim for relief under Sec. 291A is being made” should be removed.

A new mandatory question is required at the start of this panel’, (shown in red for identification purposes only, in the above screenshot).

Are amounts relating to a claim for relief under Section 291A included below (under trade profits at 12.5%)?

If yes, give details in the Relevant trade within the meaning of Section 291A sub-panel, accessed by clicking on the Section 291A button.

Beneath this text a new button – label “Section 291A” – is required. When hit, this new button should open a new subpanel with the title: Trading results – Relevant trade within the meaning of Section 291A

Trading Results	
<div><div>✓</div> Company Details</div>	<div>Form Help</div> <div></div>
<div><div>✓</div> Trading Results</div>	
<div><div>✓</div> Extracts from Accounts</div>	
<div><div></div> Irish Rental Income</div>	
<div><div></div> Irish Investment & Other Income</div>	
<div><div></div> Foreign Income</div>	
<div><div></div> Exempt Profits</div>	
<div><div></div> Capital Gains</div>	
<div><div></div> Chargeable Assets</div>	
<div><div></div> Deductions, Reliefs & Credits</div>	
<div><div></div> Research & Development Credit</div>	
<div><div></div> Film Corporation Tax Credit</div>	
<div><div></div> Capital Gains (Development Land)</div>	
<div><div></div> Close Company Surcharge</div>	
<div><div>Trade Profits at 12.5%</div><p>Do not include here details of any Profits, Balancing Charges, Capital Allowances, Losses, Charges or Group Relief relating to Qualifying Assets in respect of which a Knowledge Development Box claim is being made under Sec. 769I or a claim for relief under Sec. 291A is being made. These details should be entered in the relevant sections below</p><p>Are amounts relating to a claim for relief under Section 291A included below under trade profits at 12.5%? <input type="radio"/> Yes <input type="radio"/> No</p><p>If yes, give details in the Relevant trade within the meaning of Section 291A sub-panel, accessed by clicking on the Section 291A button.</p><div>Section 291A</div><p>Profits before Capital Allowances (where a loss occurs show 0) € <input type="text"/></p><p>Balancing Charges € <input type="text"/></p></div>	

1.1.1.19.1.1 Section 291A sub-panel

All of the questions in the existing section 291A section are informational only for 2020; they should no longer be used by the CCE.

Note the Show / Hide link should be deleted as it is no longer required.

A mock-up of this subpanel is shown below.

There is an additional line of informational text at the top of the sub-panel to make it clear that the entries in the sub-panel are information only and will not be used when calculating the liability to CT.

The information returned in this panel will not be used when calculating the Corporation Tax liability. The relevant figures should be included in the income and deductions amounts in the Trading Results panel.

[Note: there may be a number of additional questions that need to be added to this sub-panel; however I haven't finalised this yet. However they will, like the rest of this sub-panel, be informational only and have no impact on any other section of the return]

Trading Results – Relevant trade within the meaning of Section 291A

The information returned in this panel will not be used when calculating the Corporation Tax liability. The relevant figures should be included in the income and deduction amounts in the Trading Results panel.

1. Profits from a 'relevant trade' (before deduction of related interest and capital allowances) within the meaning of Sec. 291A that relate to:

1(a) Capital expenditure incurred before 11 October 2017 €

1(b) Capital expenditure incurred on or after 11 October 2017 €

2. Balancing Charges that relate to:

2(a) Capital expenditure incurred before 11 October 2017 €

2(b) Capital expenditure incurred on or after 11 October 2017 €

Capital Allowances

Machinery and Plant (other than a specified intangible asset and including motor vehicles) €

3. Amount of capital allowances available to claim under Sec. 291A(3) (Accounts-based Allowance) for this accounting period that relates to:

3(a) Capital expenditure incurred before 11 October 2017 €

3(b) Capital expenditure incurred on or after 11 October 2017 €

4. Amount of capital allowances used under Sec. 291A(3) (Accounts-based Allowance) for this accounting period that relates to:

4(a) Capital expenditure incurred before 11 October 2017 €

4(b) Capital expenditure incurred on or after 11 October 2017 €

5. Amount of unused capital allowances under Sec. 291A(3) in this accounting period available for carry forward to the succeeding accounting period (including amounts carried forward from earlier accounting periods) and that relates to:

5(a) Capital expenditure incurred before 11 October 2017 €

5(b) Capital expenditure incurred on or after 11 October 2017 €

6. If the company is making an election under Sec. 291A(4), tick the box ☐

7. Amount of capital allowances available to claim under Sec. 291A(4) (Fixed rate allowance) for this accounting period for which an election has been made that relates to:

7(a) Capital expenditure incurred before 11 October 2017 €

7(b) Capital expenditure incurred on or after 11 October 2017 €

8. Amount of capital allowances used under Sec. 291A(4) for this accounting period that relates to:

8(a) Capital expenditure incurred before 11 October 2017 €

8(b) Capital expenditure incurred on or after 11 October 2017 €

9. Amount of unused capital allowances under Sec. 291A(4) in this accounting period available for carry forward to the succeeding accounting period (including amounts carried forward from earlier accounting periods) and that relate to:

9(a) Capital expenditure incurred before 11 October 2017 €

9(b) Capital expenditure incurred on or after 11 October 2017 €

5. Amount of unused capital allowances under Sec. 291A(3) in this accounting period available for carry forward to the succeeding accounting period (including amounts carried forward from earlier accounting periods) and that relates to:

5(a) Capital expenditure incurred before 11 October 2017 €

5(b) Capital expenditure incurred on or after 11 October 2017 €

6. If the company is making an election under Sec. 291A(4), tick the box ☐

7. Amount of capital allowances available to claim under Sec. 291A(4) (Fixed rate allowance) for this accounting period for which an election has been made that relates to:

7(a) Capital expenditure incurred before 11 October 2017 €

7(b) Capital expenditure incurred on or after 11 October 2017 €

8. Amount of capital allowances used under Sec. 291A(4) for this accounting period that relates to:

8(a) Capital expenditure incurred before 11 October 2017 €

8(b) Capital expenditure incurred on or after 11 October 2017 €

9. Amount of unused capital allowances under Sec. 291A(4) in this accounting period available for carry forward to the succeeding accounting period (including amounts carried forward from earlier accounting periods) and that relate to:

9(a) Capital expenditure incurred before 11 October 2017 €

9(b) Capital expenditure incurred on or after 11 October 2017 €

10. Amount of interest available to claim as a trade deduction for this accounting period in respect of the provision of specified intangible assets that relates to:

10(a) Capital expenditure incurred before 11 October 2017 €

10(b) Capital expenditure incurred on or after 11 October 2017 €

11. Amount of interest used as a trade deduction for this accounting period in respect of the provision of specified intangible assets that relates to:

11(a) Capital expenditure incurred before 11 October 2017 €

11(b) Capital expenditure incurred on or after 11 October 2017 €

12. Amount of unused interest as a trade deduction for this accounting period in respect of the provision of specified intangible assets available for carry forward to the succeeding accounting period (including amounts carried forward from earlier accounting periods) and that relates to:

12(a) Capital expenditure incurred before 11 October 2017 €

12(b) Capital expenditure incurred on or after 11 October 2017 €

13. Amount of interest claimed as a charge on income, as restricted under Sec. 247(4B), for this accounting period in respect of the provision of specified intangible assets €

14. If a joint election is being made under Sec. 615(4)(a) TCA 1997 in respect of a specified intangible asset, tick the box and indicate:	<input type="checkbox"/>
14(a) whether the company is transferring or acquiring the asset	<input type="radio"/> Transferring <input type="radio"/> Acquiring
14(b) the tax reference number of the other company	<input type="text"/>
14(c) the name of the other company	<input type="text"/>
15. If a joint election is being made under Sec. 617(4) TCA 1997 in respect of a specified intangible asset, tick the box and indicate:	<input type="checkbox"/>
15(a) whether the company is transferring or acquiring the asset	<input type="radio"/> Transferring <input type="radio"/> Acquiring
15(b) the tax reference number of the other company	<input type="text"/>
15(c) the name of the other company	<input type="text"/>

1.1.1.19.1.2 Validation and warning message

If the new question is ticked there must be one or more entries in the Section 291A subpanel. If there are no entries in the sub-panel we require the following warning message:

Warning: You have indicated that relief under Section 291A applies but have not completed the Section 291A sub-panel, accessed via the Trading Results panel.

Ideally, we'd like the Section 291A button to be inactive unless the new question is ticked. But if that is not possible, we need a similar validation and warning message, i.e. if there are entries in the subpanel the tick box must be ticked.

Warning: you have completed the Section 291A sub-panel but have not indicated that relief under Section 291A applies.

Warning Messages	
<ul style="list-style-type: none"> ✓ Company Details ✓ Trading Results Extracts from Accounts Irish Rental Income Irish Investment & Other Income Foreign Income Exempt Profits 	<p>Warning Messages</p> <p>The following warnings have been identified:</p> <ul style="list-style-type: none"> Warning: You have indicated that relief under Section 291A applies but have not completed the Section 291A subpanel, accessed via the Trading Results panel.

Mock -up of the first warning message.

1.1.1.20 CGT loss

New field required in the Capital Gains (other than on land with Development Value) panel.

Net loss in this accounting period available for offset against these gains.

This should appear where shown in image below.

To Automatically calculate the value of Chargeable Gain/s / Net Loss/es, click the Chargeable Gain/s / Net Loss/es button		Chargeable Gain/s / Net Loss/es
Chargeable Gains before S 604A relief	€	0
Net Loss/es in this accounting period before S 604A relief	€	7000
Amount of gain relieved under S 604A	€	0
		Chargeable gains/losses after 604A relief
Net chargeable gain after Relief under S 604A	€	
Net Loss/es in this accounting period	€	7000
Previous Gain/s Rolled-over (now chargeable)	€	10000
Net loss in this accounting period available for offset against these gains	€	
Unused Loss/es from prior accounting period(s) available for offset against these gains.	€	
To Automatically calculate the value of Net Chargeable Gain in this accounting period, click the Net Chargeable Gain		Net Chargeable Gain
(a) Net Chargeable Gain	€	10000
(b) If any amount at (a) refers to a disposal of emissions allowances under Section 540A TCA 1997, enter that amount here.	€	

Field validation:

0 – 999,999,999,999

Cross-field validation:

The amount in this new field cannot be greater than the amount in “Net Loss/es in this accounting period”. It can be less.

Warning message:

Cannot be greater than the amount of Net Loss/es in this accounting period.

Mini-calc

When the ‘net chargeable gain button’ is hit, the following calculation should be carried out.

- Net chargeable gain after relief under S 604A
 - Plus
- Previous gain/s Rolled-over (now chargeable)
 - Minus
- Net loss in this accounting period available for offset against these gains
 - Minus
- Unused losses from prior accounting period.

The result should be dropped into the field (a) Net Chargeable Gain.

1.1.2 Future Developments not in Scope for v20

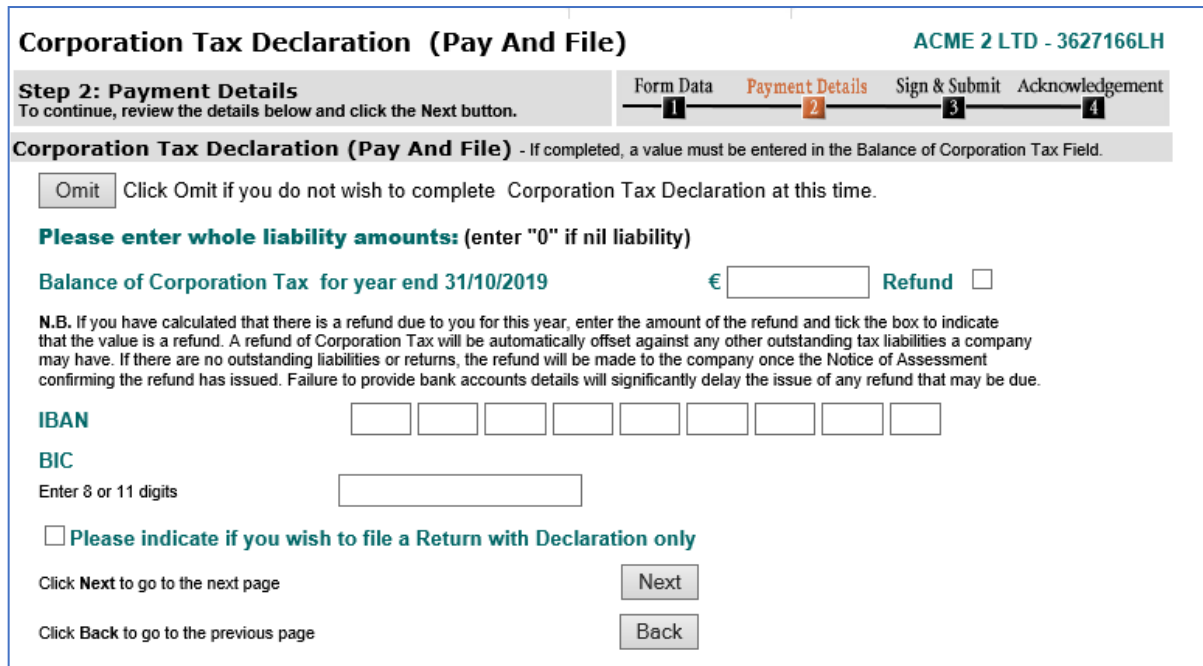
1.1.2.1 Accounting period for 1 day

Allow a one-day accounting period – a one day period CT1 return is not being allowed in ROS when it is a 31/12 year-end.

1.1.2.2 Offset CT overpayment by customer [Not Finalised – deferred from 20.2 release]

We require a facility to allow the customer to offset a CT overpayment against CT/VAT/PREM, at the time they are filing their SNL.

This should mirror the recent automation of VAT offsets [19.5_M&E_ROS_026_Automation_Workitems]



Corporation Tax Declaration (Pay And File) ACME 2 LTD - 3627166LH

Step 2: Payment Details
To continue, review the details below and click the Next button.

Form Data **Payment Details** Sign & Submit Acknowledgement

Corporation Tax Declaration (Pay And File) - If completed, a value must be entered in the Balance of Corporation Tax Field.

Click Omit if you do not wish to complete Corporation Tax Declaration at this time.

Please enter whole liability amounts: (enter "0" if nil liability)

Balance of Corporation Tax for year end 31/10/2019 € **Refund** ☐

N.B. If you have calculated that there is a refund due to you for this year, enter the amount of the refund and tick the box to indicate that the value is a refund. A refund of Corporation Tax will be automatically offset against any other outstanding tax liabilities a company may have. If there are no outstanding liabilities or returns, the refund will be made to the company once the Notice of Assessment confirming the refund has issued. Failure to provide bank accounts details will significantly delay the issue of any refund that may be due.

IBAN

BIC
Enter 8 or 11 digits

☐ **Please indicate if you wish to file a Return with Declaration only**

Click **Next** to go to the next page

Click **Back** to go to the previous page

Figure 5: Existing CT declaration screen

The existing corporation tax declaration screen is shown above. The proposed screen is shown in Figure 2 below. Note the new text is shown in red for identification purposes only – it would not be red in the actual ROS screen.

Corporation Tax Declaration (Pay And File)

ACME 2 LTD - 3627166LH

Step 2: Payment Details
 To continue, review the details below and click the Next button.

Form Data
Payment Details
Sign & Submit
Acknowledgement

1
2
3
4

Corporation Tax Declaration (Pay And File) - If completed, a value must be entered in the Balance of Corporation Tax Field.

Click Omit if you do not wish to complete Corporation Tax Declaration at this time.

Please enter whole liability amounts: (enter "0" if nil liability)

Balance of Corporation Tax for year end 31/10/2019 € **Refund** ☐

If you have calculated that there is a refund due to you for this period enter the amount of the refund and tick the box to indicate that the value is a refund.

If you wish to have some or all of the amount above offset please provide up to two offset instructions below:

Offset Instruction 1:

Offset Instruction

VAT - 01/11/2019 - 31/12/2019
 Income Tax - 01/01/2019 - 31/12/2019
 Income Tax - 01/01/2018 - 31/12/2018

Offset Amount

Offset Instruction 2:

Offset Instruction

VAT - 01/11/2019 - 31/12/2019
 Income Tax - 01/01/2019 - 31/12/2019
 Income Tax - 01/01/2018 - 31/12/2018

Offset Amount

Please note, if you have outstanding tax liabilities in other corporation tax periods or in other Taxheads, this repayment claim will be used to offset against those liabilities first.

If there are no outstanding liabilities or returns and you do not wish to offset all of the above amount, the refund will be made to the company once the notice of assessment confirming the refund has issued. Failure to provide bank account details will significantly delay the issue of any refund that may be due.

IBAN

BIC
 Enter 8 or 11 digits

☐ Please indicate if you wish to file a Return with Declaration only

Click Next to go to the next page

Click Back to go to the previous page

Figure 6: Proposed CT declaration screen.

1.1.2.3 CRS / CRO interface [Further details required – deferred from the 20.2 release]

Update the official address with the registered office address on the CRO file, where it is different.

Fuzzy matching will have to be done to check if the addresses are in fact different – the difference in structure and terminology used (e.g. street v st.) will have to be checked to ensure that only genuine address changes are made.

[Note: a rule may be required to prevent this update if the official address in CRS:

Was recently changed

Was previously the address per the CRO file but was subsequently changed?

By way of guidance, the following note has been taken from the Registrations guide on RevNET.

6.2.1 Official address

Sole Trader - This is the individual's private address.

Partnership – This is the private address of the Precedent Acting Partner.

Unincorporated Body/Trust – This is the address of the responsible party.

Company – This is the address of the Registered Office (as confirmed on CRO file) and is the legal address of the company to which certain notifications (required by company law) are issued. The Official Address on CRS must always be the same as the address on the CRO file.